



INSTITUTIONAL AUDIT AND TARGETED ACTIONS WORKSTREAM

—FINAL REPORT—

Tufts as an Anti-Racist Institution

FEBRUARY 2021

Acknowledge

Commit

Transform

Table of Contents

Introduction	2
Overview	2
The Path Forward.....	5
Targeted Actions.....	5
1. Anti-Racism Education	5
2. Compositional Diversity.....	8
3. Capacity and Resources	9
4. Accountability and Management	13
5. Structural Improvements.....	16
Policies.....	24
Analyzing the History of Racism and Its Relevance to Tufts	25
Exhibit 1.....	26
Exhibit 2	28
Exhibit 3	28
Exhibit 4	28
Appendix A: Current Programs and Initiatives	29
Appendix B: Policy Review.....	33

Introduction

Tufts as an Anti-Racist Institution is a strategic initiative that was announced by President Anthony Monaco on June 19, 2020. This was followed by a written communication on July 8, 2020 detailing the specifics of the initiative. This strategic initiative was created out of a pledge to find and eradicate any structural racism at Tufts and to take the steps necessary to become what every member of our community would view as an anti-racist institution. It includes five workstreams focused on different aspects of our academic and administrative enterprise.

Overview

The Institutional Audit and Targeted Actions workstream was charged to:

- Identify any structural racism that exists within processes, policies, and procedures for all schools and units of the university
- Build upon and learn from the anti-racism work in which many departments are already engaged
- Identify and implement specific actions that will have an immediate positive effect on our community and build momentum towards our long-term objectives and strategy
- Recommend prioritized targeted actions to remove any structural racism, and put in place processes for the accountability and transparency needed to deliver the agreed-upon actions
- Analyze the ways in which the history of racism is relevant to Tufts and informs the work of the other workstreams (e.g., any role Tufts has had in the history of slavery and racism)

To complete this work, a steering committee, with members representing all schools and units, including faculty, staff, and student representation, was established (See Exhibit 1). Members of the steering committee served as chair for their respective school/unit working group. Tufts selected Accenture as its partner to provide expertise, frameworks, tools, and resources for this important initiative. The steering committee met weekly, beginning in October. Additional meetings were conducted with school/unit working groups, with a dedicated consulting resource.

The approach to the steering committee's work included:

- **Discovering with Insight:** Defining the scope and ways of working in the *Steering Committee Charter*. Conducting focus groups, interviews, peer research and data analyses to uncover any real or potential for bias in policies, processes, and procedures across the university.
- **Describing with Impact:** Synthesizing findings identified in the Discover phase in a final report to define the vision for being an anti-racist institution and prioritize short-term and long-term action actions.
- **Co-Creating with Agility:** Engaging with the community to finalize the short and long-term actions items, to measure progress, and report out success along the implementation journey.
- **Managing Experience and Value:** Managing the project, across schools and units, to ensure that milestones are met, risks and issues are identified and addressed, and efficiency is enabled across the workstream.

The committee completed the following activities:

- **Policy Review:** Collected and reviewed 453 policies across the university identifying policies where language could provide the potential for bias (e.g., substantial discretion, single decision-makers, language that could inadvertently affect communities of color).
- **Interviews:** Met with 68 individuals across all schools and units to gain an understanding of what is working well, and where there are challenges and opportunities for improvement in processes, policies, and procedures.
- **Focus Groups:** Conducted 41 focus group sessions, which provided the feedback of approximately 250 faculty, staff, and students and across seven unique subgroups and various Tufts schools, to gather individuals' experiences as they related to racial bias. While the group endeavored to collect feedback from a statistically representative sample of the Tufts community, participation was limited. As a result, the feedback from students, faculty, and staff summarized in this report is not conclusive, but nonetheless serves as a basis for contemplation, discussion, and future inquiry.
- **Steering Committee Small Working Teams:** Engaged with each steering committee representative and their respective working teams to support research activities across each school and unit. Sixty-six people were engaged through weekly meetings.

- **Peer Research:** Leveraged an artificially intelligent, scientifically proven analytic tool that uses machine learning algorithms and publicly available unstructured information on diversity and inclusion to articulate the perception of the Tufts brand specific to attributes related to being an anti-racist institution and compare that against other peer universities
- **Faculty, Staff, and Student Data Analysis:** Evaluated school, unit, and university-level data to identify any potential racial inequities across the student and employee lifecycle.
- **Community Engagement Sessions:** Conducted four community engagement sessions to share the draft vision, strategic priorities, and samples of targeted actions for feedback

The Path Forward

The Institutional Audit and Targeted Actions workstream has developed a set of recommendations to address structural racism in processes, policies, and procedures. The recommendations fall under a vision and a set of strategic priorities that were co-developed by members of the steering committee.

VISION DRAFT

To be an anti-racist, diverse institution where together we continuously advance equity, inclusion, healing, and justice for the Tufts community and beyond.

STRATEGIC PRIORITIES

1. Anti-Racism Education – Educate and equip every member of the Tufts community to identify, address, and dismantle racism in order to drive anti-racist attitudes, values, and behaviors
2. Compositional Diversity – Increase our ability to attract and retain a diverse community throughout the university
3. Capacity & Resources – Provide the people, time, and financial resources to achieve and sustain anti-racism across the university
4. Accountability & Measurement – Hold every member of the Tufts community and the institution accountable to embody anti-racist behaviors
5. Structural Improvements – Ensure that all policies and processes are free of bias, enhance transparency, and lead to equitable outcomes

Targeted Actions

The following section identifies the findings and targeted actions for each of the strategic priorities.

Although the group endeavored to collect feedback from a statistically representative sample of community participants on questions aimed at identifying opportunities for driving Tufts forward toward its mission and vision, participation was unfortunately limited. As a result, the feedback from students, faculty, and staff summarized in this report is not conclusive but serves as a basis for future inquiry and discussion. The feedback we gathered also helped to develop themes to organize the committee's recommendations.

1. ANTI-RACISM EDUCATION

Educate and equip every member of the Tufts community to identify, address, and dismantle racism in order to drive anti-racist attitudes, values, and behaviors.

Education and Awareness

Tufts has launched multiple awareness and education campaigns and events to educate the community on anti-racism issues, including Juneteenth programming, the Unpacking Whiteness Dialogue, and the Building Bridges initiative. These measures have resulted in more open dialogue, learning, and awareness about the value of anti-racism to Tufts and the challenges to overcome.

Nonetheless, some individuals reported continuing to experience biased or racist interactions at the university. For example, several focus group participants noted that many people in their department still mispronounce and misspell their first name after the focus group participants had been working in the department for well over a year. A few staff members shared that they had been stopped when entering their office building on the presumption that they seemed like outsiders. In other focus groups and interviews, students expressed a frustration with faculty members that assume all low-income, struggling individuals are people of color. Another example is a staff member sharing that she received three or four emails from students, who identify as Asian, expressing they have been targeted and being discriminated against, including items being thrown at them. According to one undergraduate student who spoke English as a second language, a professor responded to her question by plugging “the answer... into Google Translate in English and [showing] it to [her] in Spanish.” Another student recalled being “asked to describe her identity-focused artwork... [including] what color she could use to represent Asians.” While the university has a “Working with One Another” policy that does condemn disrespectful behavior regardless of protected class, and comprehensive anti-discrimination policies, some feedback obtained in the focus group suggests that incidents of concern still occur.

Recommendations: To further improve DEI education and awareness across campus, the Audit team proposes an initial set of recommendations as follows:

- Implement the recently approved (December 2020) Office of the Chief Diversity Officers Proposal for university-wide anti-racism and anti-oppression education.
- Provide community members with the resources they need to facilitate conversations about race. For example, to help facilitate difficult discussions around race, New York University created “Responsible Dialogues Guiding Principles,” which provides an outline and best practices for sensitive conversations.¹ Consider leveraging these principles or developing new ones to support conversations about race.

¹ Responsive Dialogues Guiding Principles. NYU Global Inclusion, Diversity, and Strategic Innovation.

- Create consistent mechanisms and opportunities, such as open forums and focus groups, for the Tufts community to come together to discuss institutionalized racism, experiences, ideas, and solutions.

Training

Tufts made major strides in improving DEI training across the university in 2020, most notably by passing the historic vote to roll out mandatory racial bias training. Across the university, many schools and units already mandate hiring managers, search committee members, and others to participate in implicit bias training. These are major areas of strength within Tufts' DEI training strategy and offerings. Despite Tufts' multiple strengths in terms of DEI trainings, focus group participants expressed concerns over the quality and gaps in existing training providers. In one focus group, multiple staff members pointed to an experience where a DEI training facilitator equated experiencing discrimination to "being a Yankee fan in Boston." This left many of the training workshop's participants uncomfortable and skeptical of the quality of that particular training. Individuals without access to training also expressed a desire for more engaging behavior-oriented trainings. While research shows that training alone is not particularly effective in changing behavior, studies show that trainings coupled with other anti-racism initiatives can result in meaningful change.²

In addition to a desire for engaging, effective, and quality training, a request was made for conducting this on regular intervals. Leaving trainings at the discretion of schools and units or individual departments results in varying levels of anti-bias and anti-racism proficiency across the university. Over the past two years, 75 staff and faculty members have gone through the implicit bias training that target hiring managers and staff over the past two years. Another implicit bias training for search committees only had 89 enrollments in FY20 but has seen a significant increase to 127 enrollments in the first half of FY21.³

Recommendations: To further improve DEI and anti-racism training across campus, the Audit team proposes that the university implement a comprehensive university-wide training program targeted at driving behavioral change. This is already under way, as Tufts decided to roll-out mandatory anti-racism training for all employees, but we wanted to call out the need for it to enable behavioral change and not just traditional training. Additional guidance on how to develop and deliver effective anti-bias training

² Carter, Evelyn R. Developing & Delivering Effective Anti-Bias Training: Challenges & Recommendations. Behavior Science & Policy Institute. 2020.

³ Tufts HR.

may be found in Evelyn Carter’s “Developing & Delivering Effective Anti-Bias Training: Challenges & Recommendations.”⁴

2. COMPOSITIONAL DIVERSITY

Increase our ability to attract and retain a diverse community throughout the university.

Decision-making

Tufts appears to have made great progress in improving the racial diversity of several key decision-making bodies. For instance, among its most senior decision-making body, the Board of Trustees, Tufts has increased racial diversity by 75 percent in the last five years.⁵ However, Tufts leadership continues to have limited racial diversity, with 76 percent of all leadership self-identifying as white, non-Hispanic/Latinx.⁶ Also, approximately 80 percent of people in a manager role, a person with at least one direct report, self-report that they identify as white, non-Hispanic/Latinx.⁷ Racial diversity has also been very difficult to retain within manager positions. For example, while retention of Black/African American managers has improved in recent years, they have been two to three times as likely to voluntarily resign as their white counterparts: 17.1 percent resigned in 2018 (compared to 6.3 percent of white managers), 14.1 percent resigned in 2019 (compared to 8.0 percent of white managers), and 9.1 percent resigned in 2020 (compared to 5.7 percent of white managers).⁸ (Exhibit 3) This trend is not experienced by other racial/ethnic groups, which tend to have similar or lower voluntary turnover rates than their white peers. While the reasons for resignation may be perceived as positive (promotional opportunities elsewhere, family moves from the area, etc.) more consistent exit interviews could provide information instructive to Tufts’ retention strategy.

Recommendations: To further improve racial diversity among decision-makers and equip them to make decisions to support a racially diverse community, the Audit team proposes an initial set of recommendations as follows:

- Continue to implement mandatory, regular, and periodic anti-bias training for all decision-makers. Many of these trainings have already been implemented at the school and unit level, with a university-wide training roll-out under way.

⁴ Carter, Evelyn R. Developing & Delivering Effective Anti-Bias Training: Challenges & Recommendations. Behavior Science & Policy Institute. 2020.

⁵ Diversity and Inclusion. Diversity Dashboard - Trustees by race/ethnicity and gender. Tufts University.

⁶ Compositional Diversity Workstream. 2020.

⁷ Tufts HRIS Data. 2020.

⁸ Tufts HRIS Data. 2020.

- Consistent with applicable labor laws, consider a formal staff senate or other avenues to give staff an opportunity to inform relevant decisions that impact them. Both Staff and Faculty Senate bodies should aim to represent the racial diversity of their constituents.
- Continue to diversify decision-making councils by making DEI a priority for future recruitment and role selection.
- Establish and commit to compositional diversity goals for administrative and academic leadership, manager-level staff, and the incoming undergraduate and graduate classes.
- Continue to assess pay competitiveness against benchmarks.
- Establish a university-wide leadership development program to build an internal pipeline of diverse talent for future leadership positions.

3. CAPACITY AND RESOURCES

Provide the people, time, and financial resources to achieve and sustain anti-racism across the university.

Funding

Tufts has taken many positive steps to enable the work of anti-racism and DEI, including funding. For one, the university invested in an institutional audit conducted by a third party. The university has also allocated a portion of its annual budget to support DEI initiatives, programming, and staff. Without these funds, Tufts would not be able to employ critical DEI staff or implement DEI programming for students, staff, and faculty. Tufts' DEI budget will continue to be critical in the advancement of the university's anti-racism initiative.

While Tufts has provided funding for multiple DEI resources, including DEI staff and initiatives, individuals across 11 different schools and units expressed a need for more resources dedicated to anti-racism. This may be because DEI has not yet been made a university-wide budget priority, meaning schools and units are not required to allocate a certain percentage of their budget to DEI. This kind of budgetary priority would enable every school and unit to allocate a different proportion of their budget to DEI. This challenge is not unique to Tufts: according to research conducted by *INSIGHT into Diversity*,⁹ DEI budgets represent an average of only 0.49 percent of university-wide budgets, which aligns to Tufts' DEI spend. Despite the size of the investment, these

⁹ An INSIGHT Investigation: Accounting for just 0.5% of Higher Education's Budgets, Even Minimal Diversity Funding Supports Their Bottom Line. [Insightintodiversity.com](https://insightintodiversity.com). October 2019.

efforts can have a huge impact on recruiting and retaining students, faculty, and staff, especially those from underrepresented backgrounds, DEI officials say.¹⁰

Recommendations: To further improve DEI funding challenges, the Audit team proposes the following initial set of recommendations:

- Make DEI and anti-racism a university-wide budgetary priority such that all schools and units are mandated to allocate a portion of their budget to DEI programming and resources. This will help ensure that anti-racism resources and programming are equitably distributed across the university to reach all stakeholders.
- Provide funding to support the targeted actions coming out of the anti-racism initiative. Launch campaigns, engaging the Board of Trustees and other donors, to raise needed funds to sustain the work of anti-racism.
- Dedicate an HR employee to the development of an enhanced DEI sourcing strategy, plan, and execution.

Execution

Tufts has developed a strong foundation for the execution of its DEI strategy. In terms of staff, Tufts has over ten roles overseeing and executing DEI programming, including two chief diversity officers (CDOs) to oversee DEI across Tufts' four campuses, two (recently hired) associate directors for diversity and inclusion education and training to further support DEI efforts across campuses, and assistant/associate deans for diversity and inclusion (ADDIs) to drive DEI efforts at the school level. There are several councils on DEI that exist, including the President's Diversity and Inclusion Leadership Council (which guides the university's DEI strategy and policies); the Joint Council on Equity, Diversity and Inclusion (which promotes DEI across the health sciences campuses); and Tufts University Cabinet on Diversity, Equity and Inclusion (which convenes representatives from all of Tufts' schools for DEI initiatives). Additionally, some schools and units have established voluntary DEI councils, such as Cummings School of Veterinary Medicine. Most recently, the university declared Juneteenth a standing paid holiday for the university along with dedicated programming to encourage discussion, engagement, and education on DEI-related topics. These actions have been instrumental to the implementation of an effective DEI and anti-racism strategy.

Although the ADDI role was largely intended to be part-time, at least four ADDIs shared that they are working over 50 percent more than the time originally allocated to this

¹⁰ An INSIGHT Investigation: Accounting for just 0.5% of Higher Education's Budgets, Even Minimal Diversity Funding Supports Their Bottom Line. [Insightintodiversity.com](https://insightintodiversity.com). October 2019.

role. One ADDI shared the challenge of balancing attending critical policy meetings with supporting students because of time constraints. This conflict results in missed opportunities for diversity, equity, and inclusion to be considered in critical policy conversations. This may also result in students, staff, and faculty not receiving the full level of support they need. Additionally, although all schools have ADDIs in place, some staff units do not have dedicated access to an ADDI, causing unequal access to DEI supports among staff.

Across focus groups and interviews, multiple community stakeholders praised the university for promoting anti-racism training and workshops, such as the “Unpacking Whiteness” series and microaggression training sessions. However, several noted that these trainings and workshops were not equally accessible to all community members. For example, only certain schools and units hosted mandatory, microaggression trainings. University Advancement established a Diversity and Inclusion Task Force that has completed climate surveys, launched educational workshops and trainings, set strategic plans for DEI, and created an internal page dedicated to DEI resources for their unit. Conversely, Operations has shared their concerns about budget and time limitations challenging their ability to develop any new programming on their own.

Some focus group participants identified a lack of alignment on anti-racist messaging as a challenge to cultivating an anti-racist culture. Some felt that even at times when a racially motivated incident happens in society, the university does not take a strong stance against racism the way it does for other issues and some indicated that university-wide communications about anti-racism are not perceived as personal or heartfelt, particularly to those experiencing racial bias.

Recommendations: To further strengthen the structures in place to execute DEI, and anti-racism efforts, the Audit team proposes the following initial set of recommendations:

- Provide every unit with access to an ADDI. While most Tufts schools have an ADDI to drive school-level DEI efforts, Tufts’ units do not have this type of support, making the execution of DEI and anti-racism work inequitable for administrative staff.
- Evaluate whether all ADDI roles should be made full-time.
- Establish a governance structure for the anti-racist plan and roadmap, that is coordinated across the existing DEI infrastructure to enable it to be cascaded down effectively. Strong coordination and governance will be critical to the effective execution of anti-racism work for all Tufts stakeholders. Although it should be coordinated through DEI, Tufts needs to be conscious of who executes the work. The work of becoming an antiracist institution should not largely fall on people of color.

- Enhance the communication strategy supporting the execution of this anti-racism work. The communication strategy should outline when, where, how, and to whom progress updates should be shared.
- Communicate instances of racism and other hateful behavior to the entire university in a timely and meaningful manner.
- Conduct a stakeholder analysis at the school/unit level to understand and address barriers to access and engage in DEI programming. This step is necessary to ensuring that DEI and anti-racism work is reaching all individuals of the university.

Community Connectedness

There are racially diverse communities and spaces at Tufts. For example, Tufts has six cultural centers for underrepresented groups on campus, including the Tufts Latinx Center, Africana Center, and Asian American Center. Tufts also has Employee Resource Groups (ERGs) dedicated to promoting safe spaces and community bonding, including the Black Faculty and Staff Association (BFSA) and one for Hispanic/Latinx individuals. While Tufts offers cultural centers to many of its underrepresented groups on campus, it is important to note that one does not exist for individuals from Native and Indigenous backgrounds.

ERGs have served as critical communities for many, yet not all employees know about them. ERG leaders have also expressed challenges in operating them, with many feeling overwhelmed and unequipped to handle the work of supporting ERGs along with their regular job responsibilities. Furthermore, the level of decentralization at Tufts makes it difficult to rally around topics like anti-racism to execute a university-wide approach. Some focus group participants described that the lack of forums to share learnings, approaches, resources, and best practices on anti-racism contributes to the lack of progress against racism. Particularly, leadership of individual schools and units attempting to address institutionalized racism have indicated that, without communication mechanisms to share best practices and resources, they feel they are “reinventing the wheel.” These areas of opportunity inhibit Tufts’ ability to create community connectedness for all employees.

Recommendations: To further improve Tufts’ community connectedness, the Audit team proposes an initial set of recommendations which include:

- Provide additional resources to ERGs to support their operations, growth, and coordination efforts.
- Support ERGs toward connections to one another to enable cross-collaboration and joint ventures.

- Expand and promote the ‘buddy program’ to better connect new and existing employees and get them talking about their workplace experiences.
- Create more opportunities for staff and faculty to meet people from other schools/units through open forums, common spaces, and events.

4. ACCOUNTABILITY AND MEASUREMENT

Hold every member of the Tufts community and the institution accountable to embody anti-racist behaviors.

Vision

Since the publication of the Tufts 2013 DEI Report, Tufts has taken significant steps in its DEI agenda. “Engaging and Celebrating Common Differences” is a key theme in Tufts’ T10 Strategic Plan (2013–2023), which includes recommendations specific to DEI.¹¹ Tufts has also developed a DEI vision and has a dedicated webpage that signals the importance of diversity, equity, and inclusion to internal and external stakeholders. As Tufts’ DEI vision publicly states, *“diversity and inclusion are at the very foundation of the transformational experience at Tufts. It’s not just about making opportunities available to all; we believe by doing so, we enrich the lives of all.”* Tufts’ vision for DEI has also expanded to better meet the challenges of institutionalized racism: in response to the national movement for racial justice, President Monaco made a commitment to making Tufts an anti-racist institution. These actions have been critical to the development and realization of Tufts an institution that promotes diversity, equity, and inclusion for all members of the community.

Nonetheless, during some of the focus groups with staff and faculty, individuals shared a need for clarity around what “anti-racism” means to Tufts.

Recommendations: To further advance Tufts’ DEI and anti-racism commitment, the Audit team proposes an initial set of recommendations:

- Establish an Anti-Racism vision, using the visioning draft from the workshops articulate above
- Integrate the targeted Actions from the Institutional Audit into the larger DEI strategy. The strategy should be publicized and periodic updates against the goals shared to demonstrate progress. The strategy should include a comprehensive list of standardized definitions and strategic priorities to promote alignment, as well

¹¹ Tufts Strategic Plan Full Report.

as measurable targeted actions with owners who are accountable for the implementation of recommendations.

- As with any major change initiative, in the execution of this plan, visible leadership engagement as well as the identification of key leadership members who will serve as sponsors for the initiative will continuously reinforce the key messaging coming out of the initiative.

Measurement Capability

Tufts has invested in its ability to measure and report on compositional diversity metrics. The *Diversity Dashboard*, publicly available on the webpage diversity.tufts.edu, allows individuals to review demographic data about faculty, staff and students. This information includes data for Tufts' Board of Trustees and Boards of Advisors as well. This website provides a holistic view of demographic data for all these stakeholder groups, in a way that is both dynamic and easily accessible. However, there are additional measurements that, if tracked, could enhance Tufts' progress.

Recommendations: To further advance Tufts' ability to be data-driven in its decision-making, the Audit team proposes an initial set of recommendations:

- Establish an internal dashboard that tracks a set of metrics for DEI overall (e.g., turnover rates, pay equity, retention, promotion, by race) to proactively identify areas of opportunity and measure success against current initiatives. Of these metrics, determine which ones can be shared publicly (given the confidentiality required of personnel information) and expand the Diversity Dashboard. A process to track and pull this data, across the appropriate schools/units/systems at the university, should be established. This will enable the university to more easily identify new actions or adjustments to make in the current strategy. Next, for the metrics identified, address the technical system challenges that prevent the required data points from being pulled (e.g., better integration across disparate data systems).
- Further investigate why people who don't self-report demographic data to the university choose not to despite opportunities at the time of admissions, and in the case of employees, at the time of hire and during other annual reminders. Find opportunities to articulate the value of self-identifying race in the job and admissions applications and provide additional opportunities for students, faculty, and staff to do so. (See Exhibit 2)
- Develop a process to conduct a regularly administered climate survey to enable the university to keep a better pulse on staff, faculty, and student sentiment to adjust DEI, including anti-racism targeted actions, as needed. Finally, publish

periodic updates on the progress that is being made against the strategy for DEI and anti-racism.

- Prioritize completion of exit interviews to capture feedback from departing employees.

Accountability

Respect for Diverse Perspectives and Support for Inclusion is one of six university-wide values, for example, signaling the importance of DEI to the university's values and culture. Currently, there is neither an existing approach nor defined metrics used to measure individual performance within DEI and anti-racism goals. DEI competency is not a part of leadership evaluations or listed within the university's performance management tool. The university's values include *Respect for Diverse Perspectives and Support for Inclusion*, yet this is not included in the goal setting and performance review process.¹² The Audit group identified a number of Tufts' peers that include diversity performance standards in their appraisal forms. Some of these forms include acknowledging the employee's participation in individual and campus-related diversity efforts and initiatives, and commitment to and success in recruiting, retaining, and supporting a diverse workforce as a pathway to excellence.¹³ Implementing similar criteria may help to document progress towards achieving Tufts' values.

Additionally, some focus group participants expressed a desire for Tufts to better acknowledge and address the ways in which underrepresented community members have been negatively impacted by experiences at the university. Some examples include:

- Several individuals referenced the number of faculty from underrepresented groups that have left the institution. These individuals felt that the absence of university acknowledgement regarding the loss of racial diversity in this way has negatively impacted some individuals' perception of Tufts.
- Individuals also shared concerns around the university's ownership of indigenous land. While the university has acknowledged being on indigenous land, it has not been an area of focus.

Recommendations: To further improve accountability for Tufts' anti-racism and DEI commitments, the Audit team proposes an initial set of recommendations.

¹² Performance Planning and Review. AccessTufts

¹³ Performance Planning and Review. AccessTufts

- Develop and implement DEI criteria and performance goals to hold leadership and managers accountable. This includes updating performance processes to review and evaluate DEI performance goals.
- Convene a committee to more carefully consider some of the findings identified by the Audit group set to address the university's history (See last section of this report, Analyzing the History of Racism and Its Relevance to Tufts), including its ownership of indigenous land.
- Explore opportunities to build relationships and partnerships with Native/Indigenous communities.

5. STRUCTURAL IMPROVEMENTS

Ensure that all policies and processes are free of bias, enhance transparency, and lead to equitable outcomes.

Recruiting

Tufts has made efforts to embed DEI and anti-racism within recruitment processes. For staff recruitment, HR has processes in place to support diversity recruiting including: providing recommendations for posting on job bulletin boards in order to reach a diverse population of potential applicants; recommendations on how to change job postings to expand the applicant pool; demographic reports by requisition; and questions related to diversity during the search process on requisition forms. Staff diversity has also increased over the past five years from 27 percent to 33 percent.¹⁴

While efforts to embed DEI in recruiting have been made, barriers remain to increasing diversity in hiring. Tufts' geographic location was described by some as a significant barrier to recruiting candidates. Towns surrounding Tufts are largely comprised of homogenous populations who can afford a higher cost of living relative to other parts of Massachusetts and the United States. At least 47 percent of paid personnel at Tufts live in surrounding areas with higher costs of living.¹⁵ As a result, Tufts limits its ability to attract and recruit from a larger and more diverse candidate pool across the Commonwealth.

Additionally, more robust DEI and anti-racist recruitment guidelines would be beneficial to hiring managers and HR staff. While HR provides resources to support diversity recruitment efforts, several hiring managers have found them to be limited and have sought out external resources. There is limited capacity in HR to support diversity recruitment. When considering the importance of articulating the value of commitment to diversity, not all hiring managers or recently hired employees felt prepared to speak

¹⁴ Tufts HRIS Data. 2020

¹⁵ Office of Institutional Research. 2020.

to an emphasis on or value of DEI in interviews. Similarly, recruitment processes do not require or provide guidance for anti-racism statements in the job postings or by candidates in their applications. This may hinder the university's ability to integrate anti-racism into staff and faculty recruitment processes and publicly signal how important DEI and anti-racism is to Tufts. Internally, while most staff and faculty handbooks stress the importance of recruiting diverse populations, none of them provide specific guidelines, goals, or case examples on how to effectively achieve this. Without thorough guidance from HR policy and faculty handbooks, hiring managers may use different methods and approaches with varying degrees of success to promote DEI and anti-racism in recruitment processes.

Beyond policy and process opportunities, hiring managers who participated in interviews and focus groups also shared that there is opportunity to improve the financial resources needed to effectively recruit a diverse pool of candidates. Job bulletin boards that target racially diverse groups can be cost-prohibitive, particularly for senior-level and specialized positions. As a result, a lack of financial resources may limit diversity within a candidate pool. With a limited budget specifically for DEI anti-racism initiatives, schools and units have to actively decide to allocate resources towards supporting diversity. These financial decisions are at the discretion of leadership, which may result in inconsistent funding for diversity-focused recruitment across schools and units

Challenges to recruiting a diverse pool of applicants are further complicated by an ingrained, and often unconscious, preference for candidates with more traditionally privileged backgrounds and elite experiences. Tufts would be able to improve on recruiting from underrepresented backgrounds if applicants were more deeply considered for potential for success, including those applying from other institutions, those with transferrable skills, and perhaps by re-examining the need for specific degree requirements in certain staff roles (as appropriate).

Nonetheless, certain fields face greater challenges to recruiting a racially diverse group of individuals because of a lack of diversity in a specific field. For example, at the School of Engineering, only 1-2 percent of job applicants self-identified as Black/African American or Hispanic/Latinx.¹⁶ While the limited applicant diversity may be due to many factors, a lack of diversity in STEM may be a major contributor. According to a 2017 study of 40 elite public institutions by Li and Koedel, Black/African American faculty account for only 0.7-2.9 percent of all biology, chemistry, and economics faculty, but account for 8.8-15.1 percent of all educational leadership/policy, English, and sociology faculty.¹⁷ While this challenge appears to plague much of higher ed, Tufts may

¹⁶ Compositional Diversity Workstream. 2020.

¹⁷ Li, Diyi; Koedel, Cory. Representation and Salary Gaps by Race-Ethnicity and Gender at Selective Public Universities. SAGE Journals. August 2017.

have an opportunity to improve diversity in the field through the development of pipeline and mentorship programs and investments in prospective and current undergraduate students interested in STEM. Another example involves the field of fundraising. In the 2018 Census, 82.7 percent of individuals employed as fundraisers identified as white.¹⁸ Similarly, at Tufts, 85 percent of Advancement employees have also self-reported as white.¹⁹ By making long-term investments in the development and advancement of individuals of color in fields that tend to have limited racial diversity, Tufts may experience significant gains in its compositional diversity.

Recommendations: To further improve Tufts' faculty and staff recruitment processes, the Audit team proposes an initial set of recommendations as follows:

- Include more specific guidelines, criteria, and examples for how to form a diverse search committee and source a diverse pool of candidates. For instance, schools/units and Human Resources can recommend that search committees are diverse. Schools/units and Human Resources can also include direct links to job bulletin boards that target a diverse pool of professionals for each field. These guidelines and resources would help ensure that hiring managers remain supported and accountable throughout the recruitment process and would discourage selecting individuals without a thorough search.
- Require candidates to submit anti-racism/DEI statements and require schools/units to embed an anti-racism/DEI statement in every job posting. This will help signal the importance of anti-racism/DEI to internal and external stakeholders. Consistently incorporate behavioral questions related to DEI into the interview process.
- Expand recruiting from diverse candidate pools, including those that target specific racial/ethnic groups such as NSBE (National Society of Black Engineers).
- Increase funding for anti-racism programming to give schools/units the ability to invest in pipeline programs.
- Broaden job eligibility requirements for positions including re-evaluating degree requirements (where appropriate). Human Resources and hiring managers can also intentionally emphasize the value that those with transferrable skill sets may bring to the university to encourage additional applications from diverse groups.

¹⁸ Census Bureau, ACS PUMS 1-Year Estimate

¹⁹ Tufts HRIS Data. 2020.

- Update faculty hiring practices to institute cluster hiring and encourage dual career support for diverse hires.
- Introduce a referral recruiting program.
- Deliver effective implicit-bias training to all search committee members. Tufts may want to consider developing and delivering mandatory and behavior-focused trainings to all involved in hiring.
- Expand ability for individuals to work remotely, if possible, and broaden geographic search criteria for positions that do not need to be performed in person.

Career Development and Advancement

Career development and advancement refers to the process through which staff and faculty are recognized and rewarded for the work performed through professional development and career advancement opportunities, including promotions and raises. As part of annual reviews and merit increases, Human Resources conducts a review to identify anomalies with increases for staff personnel. There are also several Human Resources initiatives in place related to (1) establishing career ladders, (2) updating the compensation review process, and (3) updating to job description educational requirements, which all work to increase clarity, transparency, and equity in the career advancement process.

Several schools also coordinate their own mentorship programs. Faculty of color shared that they actively participate in the mentorship of students of color and spend disproportionate amounts of time and effort on search committee processes and DEI events/programming. This is often to the detriment of their own career development and advancement activities.

Across all schools and units, faculty and staff focus group participants described career development and advancement as an area of opportunity. Currently, some staff members describe career development as unclear, making it difficult to advance in their careers. The lack of clarity around career progression may result in the perception that the only consideration for advancement is an individual manager's discretion. As shared in interviews and focus groups, it is not clear to staff members without a bachelor's or master's degree how important additional educational attainment is to promotion.

Opportunities to improve the career advancement process extends to the tenure process as well. Combining interviews and focus groups, in discussions with 50+ faculty on career advancement, the vast majority identified the tenure process as one that could better support equity for women and faculty of color. For example, funding was

described of major import for tenure yet some raised concern that the award probability for applications from Black/African American PIs was roughly 55 percent of that of white PIs. While there are a number of factors involved in the award process, some of these concerns and related research may present an opportunity to look more closely at the criteria for tenure and/or to consider whether appropriate supports to those on the tenure track exist.²⁰ For instance, the weighting of criteria such as service to the community including participation on selection committees and mentoring could be reconsidered.

Recommendations: To further improve Tufts' career development and advancement process, the Audit team proposes an initial set of recommendations as follows:

- Create a university-wide mentorship program, including reverse mentoring, available to any employee (staff and faculty).
- Encourage leaders to sponsor junior members on their teams.
- Complete the Human Resources career ladder project by clarifying career ladders across all areas to increase transparency.
- Refresh and expand the performance review process to ensure it is consistently completed across the university.
- Improve the internal transfer process to better enable individuals to transition through the organization and grow their careers through experiencing new roles (e.g., shadowing programs).
- Review the criteria utilized to award tenure across schools and the resources and supports available to tenure track faculty to enhance equity in the process.

Issue Resolution

Tufts provides all community stakeholders with spaces and mechanisms to report (including anonymously) and address instances of discrimination in the educational and workplace setting through the Office of Equal Opportunity (OEO). According to OEO processes, individuals can file a report of discrimination through a third party (EthicsPoint). The process benefits community members with allegations of discrimination by providing them with a private reporting tool for their complaints and an OEO employee who can help them determine how to best resolve the matter, either informally or formally. Approximately 98 percent of informal cases or inquiries are resolved within 90 days.²¹ Once an investigative decision is reached, complainants and respondents are given access to the draft investigative report and may provide a

²⁰ Erosheva, Elena A. NIH Peer Review: Criterion scores completely account for racial disparities in overall impact scores. *Science Advances*. June 2020.

²¹ OEO Reporting Statistics. OEO Caseload of Reported Allegations FY 2015-2019. Tufts.

response on the record before the draft is finalized. Close out letters are also delivered to complainants and respondents once a matter is resolved. For the purposes of preserving the confidentiality and privacy of participants, OEO decisions are not made public. Thus, Tufts and OEO use many measures to ensure individuals have a space to confidentially report instances of discrimination and see their reports resolved promptly and privately.

While Tufts provides community members multiple supports to resolve issues related to discrimination, Issue Resolution rose as a key area for improvement in some focus group sessions. Select staff and students criticized the lack of transparency in OEO findings and recommendations for corrective action, as an example. However, they appreciated that the confidential nature of the process is essential to ensure that people are willing to come forward and share information to resolve their complaints. This natural tension between complainants' desire for privacy and the community's tendency to want full transparency of the investigative process appears to be a tricky one to navigate and reconcile. Furthermore, several individuals who have experienced racial bias by their supervisor stated that they have not filed reports to OEO for fear of retaliation, particularly those in small-team settings. These circumstances often lead to instances of discrimination being underreported. Members of leadership also shared that they did not know how the university would support corrective actions taken against individuals who perpetuate racism, particularly if they were clients or donors.

Recommendations: To further improve Tufts' Issue Resolution process, the Audit team proposes an initial set of recommendations as follows:

- Set an explicit zero-tolerance policy for racial bias and discrimination to give individuals confidence in reporting.
- Reinforce the privacy of the process so members of the community trust that their participation will be protected to promote additional reporting.
- Provide OEO with the resources needed to address the large caseload it manages involving reports, inquiries, and complaints of discrimination against all protected groups (over 650 cases per year).
- Educate the community on the fact that OEO provides safe spaces for individuals who want to share instances of discrimination or racial bias but do not wish to formally report (i.e., informal options). Informal reports constitute a majority of OEO reports.
- Support community members who report instances of racial bias and discrimination regardless of the source of the allegations.

- Model and affirm that individuals at every level of the university are protected from discrimination, regardless of whom the perpetrator is.
- Circulate existing policies that address inappropriate comments and behaviors from internal and external constituents.

Supplier Diversity

Supplier diversity refers to the proactive process of engaging businesses suppliers that are 51 percent owned and operated by an individual or group that is part of a traditionally underrepresented or underserved group.²² The university is currently working through the process of updating the procurement system to accurately reflect current diversity metrics for its suppliers. Additionally, Tufts works with Supplier IO to capture supplier diversity data and is partnering with institutions in the Boston Consortium and the Ivy Plus Group to develop supplier diversity options.

However, according to those focus group participants familiar with supplier contracts and relationships, the perception was that diversity plays a very small role in considering whether to engage a vendor. As one individual described, “quals and price are the majority drivers for [vendor] selection.” This is not rare for higher education institutions in Massachusetts. According to WGBH News, only 2 percent of active contracts awarded by a big college purchasing co-op in Massachusetts went to underrepresented or underserved owned businesses certified by the state.²³

Recommendations:

- Enhance supplier diversity by setting and publishing anti-racism and DEI goals.
- Better signal the importance of anti-racism to prospective vendors, by considering the inclusion of a statement articulating the importance of the anti-racism and DEI, in addition to already existing affirmative action statements. This will inform future prospective vendors and guide partnership decisions.

Admissions

Over the past ten years, Tufts has taken several steps to reduce barriers for students throughout the admissions process. Steps taken by Tufts include expanding its budget for financial aid and scholarships, connecting students to external scholarships and employment opportunities, and providing fee waivers to students from lower-income

²² Bateman, Alexis. Barrington, Ashley. Date, Kate. Why you need a supplier-diversity program Harvard Business Review. August 2020.

²³ Carapezza, Kirk. Mass. Colleges Embrace Diversity but Award Few Minority Contracts. WGBH News. November 2020.

backgrounds. These measures have likely helped improve racial diversity among first-year applicants.

For example, over the past six years, admissions trends for Black/African American first-year applicants have been positive: the number of applications has grown by 50 percent and admit rates have ranged between 17.5 percent and 22.8 percent. For the entering class of 2024, Black/African American applications rose by 17 percent compared to the year prior and the admit rate rose from 17.5 percent to 21.8 percent.²⁴ The representation of nonwhite undergraduate students entering the schools of Arts and Sciences and Engineering has also significantly improved in the last five years, from 37 percent in 2015 to 55 percent in 2020.²⁵ These measures and trends indicate strong improvements in Tufts' ability to attract and recruit students from financially and racially diverse backgrounds.

Despite the many positive steps Tufts has taken to attract and recruit students from all backgrounds, barriers remain that inhibit Tufts' ability to further improve the compositional diversity of the student body. For example, across focus groups standardized testing surfaced as a key barrier to investigate. Standardized tests require test takers to pay a fee (estimates ranging from \$52–\$68) and benefit individuals who can pay for study guides and tutoring.²⁶ While the College Board provides test-fee waivers to those who apply and qualify, at least one-sixth of low-income students miss out on fee waivers because they are not given information on how to redeem them.²⁷ Furthermore, application fees, tuition costs, and Tufts' limited financial aid appear to contribute to the lower application and enrollment rates of students of color. For undergraduates who do enroll, fewer than half receive financial aid, and far more students at Tufts come from families in the upper-income quartiles than the lower-income quintiles. Students from the lowest-income quintile are the most underrepresented.¹⁰ Other admissions and enrollment requirements, including the need to travel for in-person interviews for some schools, may further dissuade economically underprivileged students from applying and enrolling.

Recommendations: To further improve Tufts' admissions process, the Audit team proposes an initial set of recommendations.

- Consider making standardized tests optional. In a recent study of 28 institutions that have adopted a test optional policy, evidence suggests that the adoption of a well-executed test-optional admissions policy can lead to an increase in the numeric and proportionate representation of a more diverse pool of applicants

²⁴ Compositional Diversity Workstream. 2020.

²⁵ Compositional Diversity Workstream. 2020.

²⁶ SAT Suite of Assessments. Test Fees. CollegeBoard.

²⁷ Anderson, Greta. More SAT Test Takers but Lower Scores. Inside Higher Ed. September 2019.

and admitted students. In fact, roughly two-thirds of the 28 institutions experienced improvements in racial diversity above that of a matched test-requiring peer institution.²⁸ Implementing a similar test optional policy at Tufts may help the university realize similar improvements in its compositional diversity.

- Encourage all schools to offer virtual interviews in lieu of required on-campus interviews or provide financial assistance to those who attend on-campus interviews. Requiring candidates to attend on-campus interviews without providing financial assistance often places a significant financial burden on applicants, who often must pay for air travel and hotel accommodations. Removing the financial barriers to interview would signal the importance of equity and access to all candidates, and better enable prospective students to consider Tufts.
- Launch funding campaigns to increase Tufts financial aid and scholarship budgets. Better identify and advertise external funding opportunities to prospective students who may need financial assistance to pay for tuition and living expenses.
- Consider investing in more or expanding current pipeline programs that encourage a more diverse group of students to pursue academic careers. The University of California’s President’s Postdoctoral Fellowship Program, for example, was established in 1984 to encourage outstanding women and minority Ph.D. recipients to pursue academic careers at the University of California (UC).²⁹ The program offers postdoctoral research fellowships, professional development, and faculty mentoring to outstanding scholars whose work would contribute to diversity and equal opportunity at UC. Since 2003, approximately 75 percent of these fellows have received tenure-track faculty appointments, with over 100 of these fellows receiving faculty appointments at UC campuses.

POLICIES

Policies across the university were collected to review for language that could lead to bias or reflected institutionalized racism. An ontology of bias terms was developed and used to train machine learning software to assist the audit team with reviewing policy language. The audit team ran two manual tests of policy reviews to confirm the software worked as intended, flagging statements that presented the possibility for bias and identified a number of policies that warrant further review and/or revision (e.g.,

²⁸ Syverson, Steven T. Franks, Valerie W. Hiss. William C. DEFINING ACCESS: How Test-Optional Works. 2018. National Association for College Admission Counseling.

²⁹ President’s Postdoctoral Fellowship Program. University of California.

restrictions on extreme or eccentric hairstyles in policy, policies with substantial discretion for decision-maker(s), etc.). See Appendix B.

Recommendations: To further advance Tufts' ability to be an anti-racist institution, the Audit team proposes an initial set of recommendations to remove certain language from policies as follows:

- Remove any potentially discriminatory language from all policies (see Appendix B).
- Include everyone who is expected to demonstrate the values and behaviors of anti-racism to report incidents of anti-racist or discriminatory actions. An inclusive approach invites ownership and accountability across the entire community.
- When language allows for various outcomes, because of the different circumstances that can lead to a violation, provide clear examples. This will allow readers to better understand the scope of the policy, acceptable actions to take, and actions that can be taken when a violation occurs.
- Conduct periodic reviews of all policies to identify gaps and areas of improvement.
- Consider alternative governance structures or increase diversity in the representation of those involved in governance to reduce the risk of bias. Another option is to implement procedures to inform decision makers, so they can intentionally govern through an anti-racist lens.
- Beyond policies that exist today, create and implement policies that allow the university to consider and address racist or hateful behaviors, even if perpetuated prior to matriculation or employment.

ANALYZING THE HISTORY OF RACISM AND ITS RELEVANCE TO TUFTS

One of the charges included in the audit was to analyze the ways in which the history of racism is relevant to Tufts and informs the work of the other workstreams (e.g., any role Tufts has had in the history of slavery and racism).

A preliminary review of research on this topic (see Exhibit 4) indicated that addressing this issue in the rigorous manner needed would require time and resources beyond those of the Institutional Audit. In order to properly consider this important issue, the Audit group strongly recommends that the university form a new working group, specifically charged with analyzing the history of racism and its relevance to Tufts. Given the importance and complexity of this issue, group members should include students, faculty, and staff as well as external subject-matter experts (i.e., historians).

EXHIBIT 1

Steering Committee Members

- Maribel Blanco, Executive Associate Dean, Fletcher School of Law and Diplomacy
- Bárbara Brizuela, Dean of Academic Affairs, School of Arts & Sciences
- Celia Campbell, Administrative Associate Provost, Provost's Office
- Ian Canning, Deputy Executive Associate Dean, University College
- Kara Charmanski Squillacioti, Senior Director of Administration, Office of the Vice Provost
- Thom Cox, Director, Design Practice, Tufts Technology Services
- Krissy Day, Director of Business Operations, Friedman School of Nutrition Science and Policy
- Alexandra Fielding, Student
- Charlotte Georgiou, Student
- Donna Golemme, Executive Director, Operations
- Lisa Halpert, Senior Director of Financial Planning, Office of Budget and Planning
- Sara Judge, Vice President for Development, University Advancement
- Parker Killenberg, Student
- M.J. Kim, Senior Director of Marketing, University Communications and Marketing
- Tom Malone, Executive Associate Dean, School of Medicine
- Jane McIntyre, Financial Administrator, HNRCA
- Brandon Mennillo, Director of Administration, School of Engineering
- John Morris, Director, Athletics

- Elyse Nelson Winger, University Chaplain, University Chaplaincy
- Lili Palacios-Baldwin, Deputy General Counsel for Labor, Employment & Litigation, University Counsel
- Diane Ryan, Associate Dean Programs & Administration, Tisch College
- Dr. Jeanette Sabir-Holloway, Assistant Dean, School of Dental Medicine
- Maureen Sonnie, Director of HR Strategies, Human Resources
- Anne Spangler, Director of Planning & Projects, Human Resources
- Dr. Flo Tseng, Professor and Assistant Dean for Diversity, Inclusion, Equity, and Climate, Cummings School of Veterinary Science
- Dan Volchok, Associate Dean, Graduate School of Biomedical Science

- Accenture (Consulting Partner)

Additional resources to steering committee members include:

- Lacey Queen, Communications/staff support
- Jessica Sharkness, Office of Institutional Research

EXHIBIT 2

Percentage of Permanent Employees Who Do Not Self-Report Race/Ethnicity for Faculty and Staff

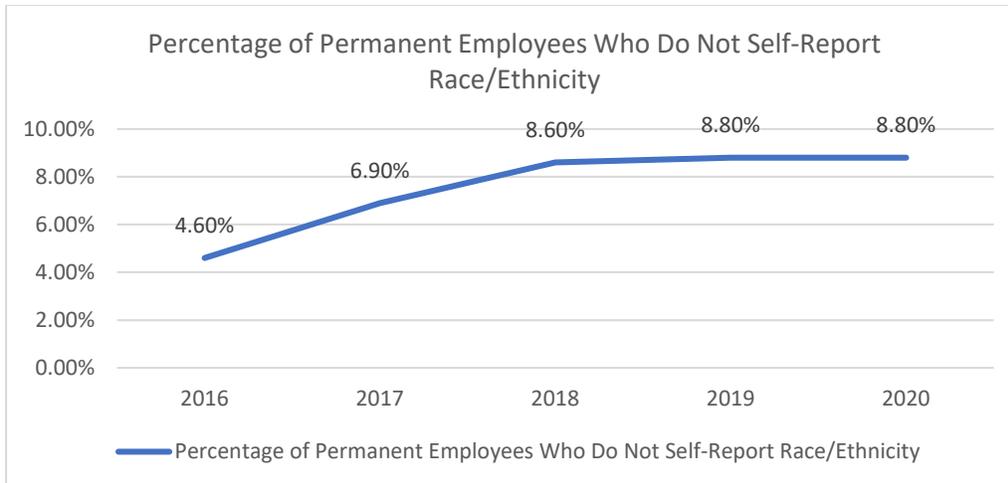


EXHIBIT 3

Voluntary Turnover Rates of Managers by Race/Ethnicity

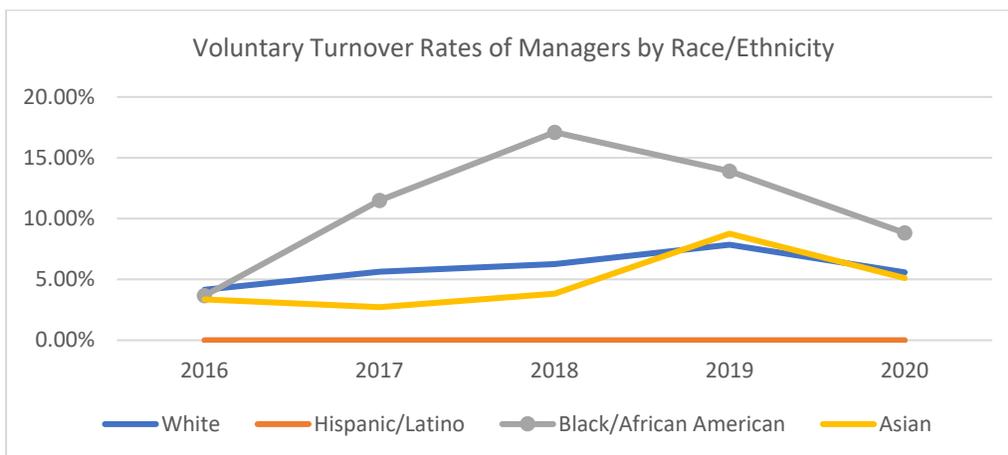


EXHIBIT 4

As described in the report, individuals shared concerns around the university's ownership of indigenous land. The Audit group collected additional information about Tufts' history:

- The university began with the vision to establish a college for Universalists and received a total of 100 acres of donated land from Charles Tufts.³⁰
- While Tufts was founded in 1852, a portion of the Medford campus (east of College Avenue) was previously owned by the largest slave-holding family in Massachusetts, the Royall family.³¹
- In the decade prior to the Civil War, a waystation on the Underground Railroad resided on the estate of a prominent abolitionist family in Medford (the Stearns family). A plaque in front of the Cousens Gym honors this.³²
- P.T. Barnum—famed American showman, founder of the Barnum & Bailey Circus, former Tufts trustee, and the link to why Jumbo the Elephant is Tufts’ mascot—purchased a slave, Joice Heth, to make money by putting her on display as the main event for a traveling roadshow.³³
- Former Tufts College President John Albert Cousens instituted quotas on students from specific ethnic groups, such as Jewish students from 1930–1940 (similar to policies enacted at Harvard).⁴⁵
- The Medford/Somerville campus is located on colonized land inhabited by the Massachusett tribal people.³⁴

APPENDIX A: CURRENT PROGRAMS AND INITIATIVES

The purpose of this section is to outline a sample of the many existing DEI programs and initiatives that support Tufts’ vision to become an anti-racist institution. While many DEI activities happen across Tufts schools, units, and campuses each year, these activities are often not shared or circulated among all university stakeholders. To increase awareness of initiatives and activities across schools and units, the Audit team listed existing DEI initiatives below. With greater coordination and communication between Tufts schools and units, many of these best practices may be replicated and scaled to produce a greater impact.

³⁰ Tufts. Land Acknowledgement. 2020

³¹ Joung, Nina. Developing an Institutional Memory at Tufts: African-American History at Tufts. The Tufts Daily. May 2016.

³² Essig, Zachary. History on the Hill: Tufts Hillel. Tufts Daily October 2016.

³³ Wright, Jr., James R. How the Public Autopsy of a Slave Joice Heth Launched P.T. Barnum’s Career as the Greatest Showman on Earth. Wiley Periodicals, Inc. August 2018.

³⁴ Tufts. Land Acknowledgement. 2020

- At the Friedman School of Nutrition Science and Policy, the leadership team has completed a comprehensive review of where issues of racism and bias could potentially exist and created an action plan that considers and/or includes: waiving the GRE, recruiting students from service programs that are racially diverse, building pipeline programs with historically black colleges and universities, philanthropy, faculty hiring and search committee training, annual review of criteria for tenure and promotion, curriculum review, research on antiracism related to nutrition, and promoting an anti-racist culture
- Since 2018, University Advancement has launched its own DEI council and climate survey. They have been creating annual DEI strategic plans and implementing targeting actions, including:
 - The establishment of Diversity and Inclusion Guiding Principles
 - The launch of the UA4YOU’s “Racial Justice Resources for UA Staff” webpage
 - Work with academic leadership to identify forefront opportunities for donors to support DEI
 - The addition of racial equity as a standing agenda item to the senior management team (SMT) weekly meeting agenda
 - The launch of an Employee Resource Group (ERG)
 - The development of a plan for the development and inclusion of a DEI-related performance goal for all UA staff in FY22 employee performance plans
- During this audit, senior leaders at the university completed anti-racist training. In addition, Human Resources provides implicit bias training targeted towards hiring managers and search committees.
- The Center for the Enhancement of Learning and Teaching (CELT) program is a resource for faculty to improve the classroom and academic experience for students. Faculty members have described the great benefits of the resource.
- The Unpacking Whiteness Dialogue has been described as an effective training and catalyst for conversations around anti-racism and DEI. Many recommended that all university stakeholders be required to participate.

- Some schools and units, including Tufts Technology Services (TTS), hosted a mandatory microaggressions training that was perceived to be effective and eye-opening. Multiple TTS employees recommended that more Tufts employees take this training.
- The Bridging Differences Grant Program enables the Tufts campus community to develop programming that will broadly support and develop structures, processes, and skills for students, faculty, and staff to engage constructively across differences.³⁵
- One implicit bias training conducted by a professor from the Department of Psychology was said to be impactful, collaborative, and provocative of discussion.
- Many members of the Tufts community have shared that the cultural centers and affinity groups have been instrumental in creating safe spaces and communities for people to engage on topics related to DEI and anti-racism.
- The University Chaplaincy sends a regular newsletter that goes out to all undergraduates, administration, and many staff, faculty, and community partners. While not anti-racist focused specifically, the newsletter contributes to an enhanced consciousness for religious and philosophical diversity on campus. For example, it highlights upcoming observances from multiple worldviews, and offers a platform for the chaplains to speak directly and personally about an upcoming holiday, tradition, etc. The newsletter contributes to an awareness for broader diversity on campus.
- Tisch College involves a DEI Committee representative in every step of the staff recruitment process to ensure that DEI considerations are accounted for in the process.
- University Advancement has started to look for transferrable skills in applications for development officer roles as a way to diversify the development sector.
- The School of Dental Medicine offers to partner students of color with prospective students of color to provide mentorship throughout the application process.

³⁵ Diversity and Inclusion. Bridging Differences Grant Program. Tufts.

- Events, such as the Graduate School of Biomedical Sciences’ “Admitted Students Day,” provide students with the opportunity to see how racially diverse their class is prior to joining
- The BEST, BLAST, and BEAST are programs for incoming first years that seek to support, develop, and retain students who are first-generation college students, and/or attended an under-resourced high school, and/or were affiliated with a college access agency. Several students shared that that these programs have been phenomenal in providing them with the support they need to succeed.
- The Athletics department recently launched the Tufts Athletics Future Leader Graduate Fellowship, which offers a two-year graduate fellowship for a future leader seeking a career in intercollegiate athletics administration. The fellowship provides students with a living stipend, funding for professional development (e.g., conferences), and an opportunity to spend time in various units within the Department of Athletics. Once fellows complete their master’s, they can choose to apply for a position in Athletics, if one is available, or leave with no strings attached.³⁶
- The university provides subsidized housing that is intended to recruit and retain graduate students, faculty, and staff at Tufts.
- In Tufts’ policies, it is consistently stated that discrimination will not be tolerated and that instances of discrimination should be reported without any fear of retaliation. This type of policy language in student, faculty, and staff handbooks helps to set a university-wide expectation for what will or will not be tolerated. The *Discrimination Complaint Processing Guidelines* describe the process through which instances of discrimination will be considered and addressed, with the well-being of all Tufts community members considered priority.
- The *Standards of the Tufts Community* policy states that Tufts is an equal opportunity affirmative action employer and sets the expectation for collaboration and non-discrimination across campus.
- Tufts Technology Services has successfully signaled the importance of DEI and anti-racism to its constituents through its “Meaning of Diversity” statement and its CARES/DEI Council, which hosts inclusive events on anti-racism and DEI.

³⁶ The Market Careers in College Athletics. Tufts Athletics Future Leader Graduate Fellowship. NCAA.

APPENDIX B: POLICY REVIEW

Policy	Statement	Theme	Rationale for Flagging Statement
Handbook Faculty A&S, SOE	In exceptional cases the deans may appoint an individual without a search in consultation with the department and the affirmative action officer.	Discretion	Discretionary decisions by a single individual can lead to unequal outcomes.
Guide to Core Clerkships & Sites	Extreme or eccentric hairstyles and colors are inappropriate.	Potentially Discriminatory	The terms “extreme or eccentric” are not clear. Such terms can be viewed as discriminatory.
Faculty Handbook Veterinary	All members shall have voting privileges and must hold the rank of Associate Professor or Professor.	Governance	Broader theme around the general governance structure at the university. This language shows a governance structure and system that privileges the privileged.
Tisch Internal Interview process	I understand that I may be responsible for all costs associated with completing the background checks documentation required by	Inequitable	Language may result in bias outcomes for individuals (e.g., it may be harder for some individuals to

Policy	Statement	Theme	Rationale for Flagging Statement
	the sites to which I have been assigned.		pay for background check costs).
Discrimination Complaint Resolution Guidelines	Discrimination Complaint Processing Guidelines for employees and third parties. Tufts will take all available steps to promptly thoroughly and impartially investigate and address complaints of discrimination including discriminatory harassment and other discriminatory misconduct by and against its employees and third parties including visitors and community members. These Processing Guidelines are flexible and may be adapted on a case-by-case basis to promote a thorough impartial and effective process.	Lack of definition	Adaptable and flexible guidelines can be clarified.
Sexual Misconduct Adjudication Process	Best efforts will be made to have the decision-making panel be reflective of the demographic identities of the complainant and or respondent particularly if requested by either or both	Lacks guidance	“Best efforts” is a vague term that does not convey the rigor of the process. Without representative representation,

Policy	Statement	Theme	Rationale for Flagging Statement
	of the parties and if known and available.		decisions can lead to bias outcomes.
Tufts University Athletics Handbook	Tufts does business in and with a number of governments in and outside the U.S., and to the extent applicable, this statement is intended to incorporate the prohibition of any unlawful discrimination covered by applicable laws in such countries, states, and municipalities	Limited in scope	Policy is limited to “unlawful” discrimination.”
2020-21 Student Handbook 11.2 Final	Duty to Report managers, supervisors, faculty and other agents of the university are required by law to report any known or alleged incidents of discrimination or harassment to OEO.	Limited reporting responsibility	By specifically calling out the individuals required to report and not defining the timeline for prompt reporting, this wording leaves the potential for unequal outcomes.
PI Eligibility for Extramural	Failure of the PI to fulfill their responsibilities in compliance with the award	Non-committal	Language that uses the term “may” indicates the

Policy	Statement	Theme	Rationale for Flagging Statement
Funding Programs	terms and conditions sponsor regulations and Tufts policies may result in administrative actions up to and including replacement of the PI on the project termination of the award with the sponsor and suspending submission of any new proposals on behalf on noncomplying PI or inclusion of noncompliant investigator in proposals.		possibility of an action. While non-committal language is standard in legal documents, allowing for discretion in corrective action that may serve the individual; language in policy can expand to provide additional context on what may happen.

Faculty Handbook-Veterinary-August 2020

This assessment also will include demonstration of responsibility (readily assumes assignments and performs assigned duties), dependability (on time, low absenteeism, meets deadlines), communication skills (ability to make oneself understood to clients, staff, and students), collegiality/professionalism (compatibility, works well with trainees, staff, students, and peer faculty), respectfulness (treats others with respect even if opinions differ), teamwork (understands and

Opportunity

Lacks specifications for diversity or anti-racist statements.

Policy	Statement	Theme	Rationale for Flagging Statement
	demonstrates teamwork necessary for success and ethical behavior).		
Faculty Search Procedure	Each department program is responsible for placing additional ads in more field-specific and diversity-oriented venues.	Other	Opportunity: be clearer about ads and accountability expectations.
Student-Code-of-Conduct-7-1-2020	A bias-motivated violation is not a separate policy violation but is the violation of another policy that was motivated by the offender's bias.	Unclear language	Confusing language, hard to interpret
Student_2020.1 Academic Affairs Student Handbook AY20-21-2	The presiding officer of the EFB has the power to grant deny such a request.	Power	Policy lacks criteria regarding how such a vote should be made; leaves power to a single individual who has their own set of implicit biases.
Student Handbook 2020-2021_FINA	Personality differences or conflicts (general mistreatment not based on the above protected categories or a response to poor performance) are usually employee relations	Presumptive	The statement speaks to personality and discrimination under the assumption that the two are discrete categories.

Policy	Statement	Theme	Rationale for Flagging Statement
	issues, not discrimination matters.		
Faculty Handbook-Veterinary-August 2020	<p>Advertisement of opening(s), including position description and such specific criteria to be met by candidates as degrees held, experience, board eligibility/certification, and area of specialization</p> <p>Interview and recommendation of qualified candidates by the Department Chair and members of the search committee and or departments</p> <p>In the departments of the Cummings School after a search has been conducted and before a written offer is made to a prospective faculty member, the Chair of the appropriate department must submit to the Dean a letter of recommendation for the new appointment with all of the supporting material: the candidate's curriculum vitae (including</p>	Opportunity	Statement does not contain specifications for diversity or anti-racist language.

Policy	Statement	Theme	Rationale for Flagging Statement
	<p>publications and or research), information on the candidate's teaching record (if available), letters of recommendation (including a letter from the Search Committee, if appropriate) the Affirmative Action package, a completed Personal Action Form (PAF), and a proposed appointment letter.</p>		