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Equity in North Carolina's SHLT-003: Gaps and Recommendations for Inclusive Trauma-Informed Education

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ABSTRACT

North Carolina's School-based Mental Health Policy (SHLT-003) claims to promote trauma-informed education. Still, it fails to address the systemic inequities that cause trauma for students of color, LGBTQ+ youth, and economically marginalized communities. Using qualitative document analysis with equity frameworks, this study explores how SHLT-003's language reinforces rather than challenges educational inequities. Although the policy incorporates trauma-informed terminology, it lacks explicit commitments to culturally responsive and antiracist practices, relying instead on compliance-focused approaches that perpetuate deficit-based narratives. The analysis uncovers discretionary language in key equity areas while only requiring procedural steps, allowing districts to implement trauma-informed education inconsistently. By not explicitly recognizing racism, poverty, and systemic oppression as root causes of trauma, SHLT-003 risks becoming another tool of performative justice—one that acknowledges disparities but fails to enact real power redistribution. Recommendations include integrating antiracist frameworks, mandating equity-focused implementation, and prioritizing community voices in trauma-informed education policy development.

Keywords: cultural responsiveness, educational equity, North Carolina, policy analysis, trauma-informed education

In North Carolina, students of color, LGBTQ+ youth, and those from economically marginalized backgrounds disproportionately face systemic trauma. However, state

policies like North Carolina's School-based Mental Health Policy (SHLT-003) often fail to address the underlying causes of these disparities. This analysis is guided by commitments to equity, social-emotional learning, and social justice within PK-12 education. Recognizing that educational research is deeply connected to systems of power and privilege, this study approaches policy analysis reflexively, acknowledging that researcher positionality and professional contexts influence interpretations. This work is rooted in a dedication to amplifying voices from marginalized communities and contributing to more just and equitable educational systems.

Education policy is often seen as a neutral tool for improving student outcomes. However, its effects are influenced by historical, political, and ideological forces that determine who benefits and who remains marginalized (Diem & Young, 2015). This paper critically reviews North Carolina's SHLT-003 policy using culturally responsive, antiracist, and trauma-informed frameworks. It evaluates how well the policy aligns with equity-focused practices and highlights areas for reform. Ensuring trauma-informed education addresses educational inequities requires policy language that is both culturally sensitive and explicitly antiracist.

Developed to fulfill the requirements of N.C. Gen. Stat. § 115C-376.5, SHLT-003 aims to create a school-based mental health framework that addresses student trauma through intervention, training, and resource allocation. On the surface, the policy appears to advance mental health equity by ensuring all public schools implement a structured mental health plan. SHLT-003 aligns with national efforts to incorporate trauma-informed education approaches into school systems, responding to the growing awareness that trauma is a systemic issue, not just an individual experience (Perry & Szalavitz, 2017; Souers & Hall, 2016). It requires mental health training for educators, suicide risk protocols, and multi-tiered support systems (MTSS) to identify and address student trauma.

Despite growing attention to trauma-informed education policy, significant research gaps remain in examining how racism, classism, and other structural inequities shape school-based mental health outcomes. For example, Gorski (2019) warns that many school equity efforts become detoured by "poverty of culture" and deficit ideology, attributing disparities to students' culture rather than naming systemic racism. Love (2019) similarly demonstrates how trauma-informed initiatives can perpetuate colorblind approaches unless they explicitly address structural conditions. Policies that fail to identify racial, economic, and social oppression as root causes of trauma risk reinforcing colorblind approaches to intervention. Research demonstrates that Black, Indigenous, and other students of color, LGBTQ+ youth, and students from economically and historically marginalized communities disproportionately experience intergenerational and structural trauma linked to racism, discrimination, and poverty (Ginwright, 2018; Gorski, 2019; Love, 2019).

Reinforcing or Dismantling Systemic Inequities

Education policies are never neutral: they are products of power, shaped by the ideological interests of those who create, implement, and enforce them (Ball, 2015;

Apple, 2018). While policies like SHLT-003 claim to support student well-being, they often do so through bureaucratic procedures that prioritize compliance over real change (Mehta & Fine, 2019). Educational policies maintain existing power inequalities by emphasizing legal protections rather than true equity, failing to reallocate resources to address historical injustices (Eubanks et al., 1997; Annamma et al., 2019). For example, funding systems for school mental health services in North Carolina still mirror racial and socioeconomic disparities. Rural and urban schools serving predominantly Black and Brown students often lack the financial and staffing resources needed to effectively implement trauma-informed practices, even when policies like SHLT-003 require intervention (Darling-Hammond, 2020). Policy becomes a tool for performative justice by acknowledging inequities without redistributing power, if it lacks specific provisions for targeted funding and community-led decision-making (Patel, 2016). A truly equity-focused policy framework would go beyond simply identifying student mental health needs; it would investigate the conditions that produce educational trauma. This involves shifting from a model of trauma "mitigation" to one of trauma resistance and healing, transforming schools into spaces focused on racial and social justice change (Ginwright, 2018).

The Myth of Policy Neutrality

Critical Policy Analysis (CPA) dismantles the myth of policy neutrality by examining how power operates in policymaking: who benefits, who is marginalized, and what ideological assumptions shape policy language (Diem & Young, 2015; Darder, 2012). Traditional policy analysis assumes that well-intended policy leads to equitable outcomes, failing to recognize that policy itself is a mechanism of social control that consistently prioritizes dominant narratives of safety, discipline, and intervention over liberation, self-determination, and justice (Gillborn, 2013; Leonardo, 2022).

Many education policies employ symbolic rather than substantive equity language, acknowledging mental health disparities while sidestepping the structural causes of trauma (Crenshaw, 1991; Collins, 2019). This aligns with larger patterns in policymaking, where terms like "equity" and "inclusion" are increasingly invoked but rarely defined in ways that require structural accountability (Ahmed, 2012). CPA reveals that the omission of race, economic injustice, and systemic violence from policy language is itself an ideological choice. This choice protects policymakers from having to engage in the radical redistribution of power necessary for true educational justice (Freire, 2000; Emdin, 2016).

One of the central concerns in CPA is the distinction between policy as text versus policy as practice (Ball, 1993). Policies like SHLT-003 may appear progressive in their textual form, incorporating mental health discourse and intervention strategies. However, in the absence of enforcement mechanisms, funding allocations, and educator training that explicitly center racial and social justice, these policies fail to disrupt the inequities they claim to address (López et al., 2018; Gorski, 2019). This study examines policy through three key questions:

1. What language related to culturally responsive, antiracist, and equitable practices in trauma-informed education is codified in state policy SHLT-003?
2. What potential beliefs regarding these principles are embedded in the policy?
3. What recommendations can enhance SHLT-003's accessibility and inclusivity?

By placing SHLT-003 within a larger historical and sociopolitical context, this analysis can critically interrogate whether this policy is an instrument of systemic change or another example of compliance-driven reform that perpetuates existing educational injustices under the guise of progress (Darder, 2012; Annamma et al., 2019). Absent intentional policy changes, trauma-informed education risks remaining partial in scope, leaving the systemic conditions that create and sustain student trauma unchallenged. To achieve its intended impact, SHLT-003 should directly confront structural barriers such as racism, poverty, and heteronormativity, embedding these realities into its framework. This paper proceeds through five sections: a literature review examining trauma-informed education policy development, a theoretical framework grounding the analysis in critical policy analysis and equity-centered approaches, a methodology detailing the qualitative document analysis approach, findings analyzing patterns in equity-focused language, and discussion of implications for policy reform.

THE HISTORICAL DEVELOPMENT OF TRAUMA-INFORMED EDUCATION

The concept of trauma-informed education has evolved over the past several decades, shaped by advances in psychology, social work, and education policy. Based initially on clinical understandings of trauma and its psychological effects, trauma-informed education has increasingly become a policy focus in K-12 schools, especially as awareness of the impact of Adverse Childhood Experiences (ACEs) on learning and behavior (Felitti et al., 1998; Perry & Szalavitz, 2017). ACEs are potentially traumatic events that occur during childhood, such as abuse, neglect, or family instability, which can have lasting effects on a person's health, development, and educational success. Despite widespread adoption of trauma-sensitive school models, the implementation of trauma-informed education remains uneven. Many policies promote compliance-driven approaches that prioritize risk identification and procedural mandates over transformative, relationship-centered care models (Ginwright, 2018; Love, 2019).

A central debate in trauma-informed education centers on whether schools should prioritize risk identification and intervention or embrace relational, culturally sustaining models that center student agency and healing (Craig, 2016; Perry & Winfrey, 2021). Many state policies emphasize risk assessment, mental health screening, and tiered interventions—an approach that aligns with neoliberal, data-driven models of education reform (Zhang et al., 2023). These policies focus on early

identification of "at-risk" students but continuously fail to challenge the structural conditions that produce trauma in the first place (Ginwright, 2018).

In contrast, critical scholars argue that trauma-informed education must be rooted in justice-oriented frameworks that acknowledge the role of racism, poverty, and systemic oppression in shaping student trauma (Paris & Alim, 2017; Love, 2019). While risk assessment models pathologize students, relational approaches center community healing, culturally responsive pedagogy, and student empowerment (Ladson-Billings, 2021). Little is known about how state policies navigate these tensions between procedural compliance and relationship-centered approaches, creating a need for systematic policy analysis. In the absence of explicit integration of racial justice frameworks, state policies may risk reinforcing deficit-based understandings of trauma, framing students as passive recipients of mental health intervention while overlooking their role as active participants in their healing (Tuck, 2009; Winn, 2018). Empirical studies of trauma-informed initiatives in K-12 settings show that without sustained, high-quality professional development, sufficient staffing and resources, and intentional culturally responsive practices, implementation often remains compliance-oriented rather than yielding equity-driven change (Gherardi, 2022; Gherardi et al., 2021; SAMHSA, 2014).

Institutional Texts

Literature on institutional texts demonstrates that they must be activated in order to exert power (Smith, 1987). Texts such as policies are meant to be read, interpreted, and applied to align individual behavior—or in the case of education policy, to align schools, districts, or other organizational bodies—with institutional priorities. In the case of trauma-informed policy, districts are meant to strategically plan for and execute trauma-informed education for students. In the process of implementation, leaders often translate policies into manageable (i.e., compliant) routines unless central offices invest in capability and support (Honig, 2006). In so doing, their sensemaking in implementation promotes compliance-driven approaches that prioritize risk identification and procedural mandates over transformative, relationship-centered models (Coburn, 2004; Ginwright, 2018; Love, 2019; Spillane, Reiser & Reimer, 2002).

Without explicit racial justice frameworks, policies risk reinforcing deficit-based views of students and families. Research shows that trauma-informed initiatives often emphasize compliance and risk management over culturally responsive, strengths-based approaches (Ginwright, 2018; Love, 2019). School behavioral health policies often focus on measurement and risk avoidance, sometimes neglecting culturally responsive practices that center student and community assets (Gorski, 2019; SAMHSA, 2014).

North Carolina's Policy Context

The evolution of trauma-informed education policy in North Carolina has been shaped by legislative efforts aimed at expanding mental health access in schools. A key milestone in this process was the passage of N.C. Gen. Stat. § 115C-376.5, which

mandates the development of school-based mental health plans across the state. This statute, enacted in response to concerns about student mental health and school safety, requires public school units (PSUs) to create policies addressing mental health training, risk assessment, and intervention protocols while prioritizing procedural mandates (North Carolina General Assembly, n.d.).

While § 115C-376.5 established a foundation for school-based mental health services, it did not embed trauma-informed frameworks that explicitly acknowledged the systemic nature of student trauma (North Carolina General Assembly, n.d.; Gorski, 2019). The statute prioritizes training requirements and referral processes and does not offer guidance on culturally responsive, relationally grounded interventions (North Carolina General Assembly, n.d.). This legal foundation shaped the development of SHLT-003, which codifies mental health practices required in NC schools (North Carolina State Board of Education [NCSBE], n.d.). The relationship between legislative mandates and policy implementation frameworks would benefit systemic analysis, particularly regarding equity integration in trauma-informed education policies.

Beyond SHLT-003, several House and Senate bills have contributed to mental health policy discourse in North Carolina schools, though with varying levels of success in implementation. For example, House Bill 849 (2019) aimed to expand school-based mental health personnel but was limited by funding constraints and the uneven distribution of resources across districts (North Carolina General Assembly, 2019). Senate Bill 476 (2020) mandated educator mental health training but failed to require whole-school trauma-responsive frameworks, reinforcing piecemeal approaches (NCSBE, 2020).

Prior to the implementation of SHLT-003, North Carolina lacked a statewide, cohesive framework for trauma-informed education. While some districts independently developed mental health initiatives, these efforts remained inconsistent and largely dependent on local leadership and funding availability (North Carolina State Board of Education [NCSBE], n.d.; North Carolina Department of Public Instruction [NCDPI], n.d.; Gorski, 2019). Existing policies primarily focused on mental health screening and intervention, which failed to address trauma's intersection with racial, economic, and social inequities (Gorski, 2019; Ginwright, 2018; SAMHSA, 2014).

The emphasis on mental health identification without a parallel focus on systemic healing approaches reinforced a deficit-based model, positioning students as subjects of intervention while disregarding their role as co-creators of their own healing (Tuck, 2009; Ginwright, 2018; Love, 2019). Additionally, previous policies emphasized compliance over capacity-building, requiring schools to document mental health interventions but failing to ensure sustained professional development in trauma-informed care (North Carolina State Board of Education [NCSBE], n.d.; North Carolina General Assembly, n.d.; SAMHSA, 2014). The absence of statewide accountability measures meant that some districts embraced comprehensive trauma-informed practices, while others merely fulfilled minimum reporting requirements and failed to enact substantive change (North Carolina Department of Public Instruction [NCDPI], n.d.; Gorski, 2019; Noguera, 2021).

Comparative Policy Analysis

A comparative analysis of trauma-informed education (TIE) policies highlights key distinctions among California's Senate Bill 224, Washington's RCW 28A.415.445, and federal guidelines under the Every Student Succeeds Act (ESSA), 2015. These differences illustrate the contrast between compliance-driven approaches, which focus on procedural adherence and training, and equity-driven approaches, which integrate systemic transformation and culturally responsive education.

Federal Policy Framework: ESSA's Compliance-Driven Approach

The Every Student Succeeds Act (ESSA) provides broad federal guidance for student success and educational equity, including provisions for mental health and trauma-responsive learning environments. However, ESSA remains largely procedural, leaving implementation details to state discretion. While the policy references equity, it does not mandate culturally responsive or antiracist educational practices, resulting in limited systemic impact on historically marginalized communities.

California's Senate Bill 224: A Model for Equity-Embedded TIE Policy

Unlike ESSA, California's Senate Bill 224 (SB 224) explicitly integrates equity and cultural responsiveness into trauma-informed education. This policy requires public schools to provide mental health education with an emphasis on diversity, inclusion, and cultural competence. While compliance-driven approaches typically prioritize procedural adherence and training, California's approach embeds equity into its directives, ensuring trauma-informed education also addresses systemic barriers and promotes culturally responsive practices.

Washington's RCW 28A.415.445: Professional Learning Focus

Washington's RCW 28A.415.445 (Revised Code of Washington [RCW] 28A.415.445) takes a different approach by focusing on educator training requirements for culturally responsive and trauma-informed instruction. While it does not embed systemic antiracist policy language as California does, Washington's emphasis on professional learning and school-wide practice shifts aligns more closely with training-centered model than SB 224's curriculum-focused framework.

Other states have also moved toward more equity-integrated trauma-informed frameworks, though with varying degrees of success, demonstrating that North Carolina's current approach is not the only available model. Table 1 provides a synthesized comparative review of different trauma-informed policies. Including such comparisons in policy discourse can help identify promising practices for bridging procedural mandates with systemic equity goals.

Table 1: Compliance-Driven vs. Equity-Driven Trauma-Informed Education Models

Policy	Primary Focus	Equity Integration	Key Language Used	Implementation
California (SB 224)	Equity-centered, culturally responsive	Strong	"Diversity," "cultural competence," "inclusion"	Whole-child model, culturally responsive teaching
Washington (RCW 28A.415.445)	School-based professional learning	Moderate	"Culturally responsive," "trauma-informed"	Educator training, school-wide implementation
Federal (ESSA)	Broad national framework	Minimal	"Guidelines," "support," "standards"	State-determined application, general TIE guidance

Note. The researchers synthesize the information in this table based on a comparative review of California's SB 224, Washington's RCW 28A.415.445, and the Every Student Succeeds Act (ESSA). The table represents an original synthesis and is not directly reproduced from any single source.

A comparative analysis of these policies can help reveal critical gaps that may exist in trauma-informed policies, such as potential absences of explicit equity commitments and emphases on compliance over systemic change. Such gaps can reveal missed opportunities for integrating whole-school equity. California's policy appears to include a direct focus on diversity, inclusion, and cultural competence, while others remain procedural and neutral, potentially failing to address systemic inequities with explicit equity commitments.

Washington's model, while not as equity-centered as California's, demonstrates a professional learning-focused strategy that North Carolina could build upon by expanding educator training requirements beyond compliance-driven mandates toward ongoing, equity-centered capacity building.

Bridging the Gap: A Need for Equity-Embedded Policy in North Carolina

To move beyond compliance-driven mandates, trauma-informed education policies should integrate explicit cultural responsiveness and systemic equity provisions. Policy revisions should incorporate stronger equity language to ensure a more holistic, inclusive, and effective trauma-informed education framework. By adopting key strategies from California's systemic equity model and Washington's

professional learning approach, North Carolina can foster a more equitable educational landscape that prioritizes healing-centered engagement and systemic change. While research establishes the importance of equity-centered trauma-informed education, significant gaps remain in three areas: (1) systematic analysis of how state policies integrate equity frameworks through language, (2) understanding of implementation variability based on policy mandates versus discretionary language, and (3) comparative analysis of different state approaches to trauma-informed education policy. These different state approaches highlight the variation in trauma-informed education policy frameworks across jurisdictions. This study examines SHLT-003's policy language and structure to address these gaps.

Gaps in Policy Language Analysis Research

Despite growing attention to trauma-informed education policy, significant research gaps remain in how such policies are written, interpreted, and enacted in K–12 contexts. Scholars consistently note that while trauma-informed frameworks are widely promoted, policy language often lacks clarity and coherence, which limits meaningful implementation (Ball, 1993; Coburn, 2004). For example, research shows that trauma-informed education risks reinforcing deficit framings when policies and professional development fail to account for structural inequities such as racism and poverty (Gherardi, 2022; Gherardi et al., 2021). Work by Gherardi (2022) demonstrates that even when schools engage with trauma-informed approaches, translation into equity-centered practice is uneven without adequate systemic supports and culturally responsive guidance.

Another important gap concerns the accessibility and precision of policy texts themselves. Research on education policy language more broadly shows that vague or technical language in statutes and state guidance documents often leads to uneven enactment and surface-level compliance (Ball, 1993; Coburn, 2004). In the mental health arena, federal and state documents frequently prioritize compliance, tiers, and measurement while leaving equity concepts undefined, which can unintentionally reinforce deficit narratives (SAMHSA, 2014). These gaps highlight the need for policy analyses that attend to both the content of policy language and the conditions of enactment if trauma-informed education is to move beyond rhetoric toward equity-driven systemic change.

Critical Policy Analysis Approach

Education policy is frequently framed as a neutral instrument for addressing identified needs; however, Critical Policy Analysis (CPA) recognizes that policy texts are political artifacts, shaped by the values, priorities, and power structures of those who create them (Diem & Young, 2015). CPA interrogates not only the explicit language of a policy but also what is left unsaid, whose perspectives are prioritized, and how underlying assumptions inform its structure.

In this study, CPA provides a lens for examining how SHLT-003 codifies—or omits—language related to trauma-informed education, culturally responsive practices, antiracism, and equity. Rather than evaluating the policy solely for

procedural adequacy, CPA enables us to situate SHLT-003 within broader sociohistorical and political contexts, considering how its provisions may reproduce or disrupt structural inequities. This framing connects directly to the methodological application described later, but here, CPA serves primarily to establish the critical perspective guiding the analysis.

Equity-Centered Analysis Framework

This analysis is also grounded in an equity-centered framework, which draws from culturally responsive education (Gay, 2018; Ladson-Billings, 2021), antiracist pedagogy (Kendi, 2019; hooks, 1994), and healing-centered engagement (Ginwright, 2018). Equity-centered approaches emphasize dismantling structural barriers, redistributing resources, and affirming the identities and assets of historically marginalized communities.

In this study, equity is understood as both a guiding value and an evaluative standard—meaning SHLT-003 is examined not only for the presence of equity-related terminology but for its potential to advance systemic change and culturally sustaining practices. This perspective is particularly critical in trauma-informed education policy, where procedural compliance may coexist with persistent inequities if systemic conditions remain unaddressed.

Connection to Guiding Frameworks

The combination of CPA and equity-centered analysis directly informs the four guiding frameworks used in this study's methodology: Trauma-Informed Education (TIE), Culturally Responsive Education (CRE), Antiracist Frameworks, and Equity-Centered Practices. These frameworks provide a clear set of principles and associated terminology drawn from seminal scholarship. Linking conceptual theory to applied analysis ensures that the evaluation of SHLT-003 addresses both the technical adequacy of the policy language and its alignment with equity-driven educational practices.

This theoretical foundation highlights a critical implementation concern: Ball's policy enactment theory demonstrates that vague policy language creates space for local interpretation rather than consistent implementation (Ball, 1993). Coburn's (2004) research on sensemaking reveals this leads to superficial adoption without deep systemic change. This document analysis method identifies potential interpretation gaps in policy language that may contribute to inequitable implementation outcomes, providing a systematic approach to examining how policy texts may inadvertently enable the discretionary implementation that perpetuates educational inequities.

METHODS

Building on this theoretical foundation, this study employs qualitative document analysis (QDA) as its primary methodological approach, using critical policy analysis principles to assess how SHLT-003 codifies language related to trauma-informed education, culturally responsive practices, antiracism, and equity. QDA enables a

systematic and structured review of policy language and implicit assumptions, allowing for an in-depth examination of textual patterns, terminology, and omissions (Bowen, 2009). CPA enhances this analysis by interrogating how SHLT-003 frames policy issues, whose perspectives are prioritized, and what underlying beliefs shape its structure (Diem & Young, 2015). This dual approach ensures that the study thoroughly evaluates both the explicit language and the implicit power structures within the policy.

The study is guided by three core research questions: (1) What language related to culturally responsive, antiracist, and equitable practices in trauma-informed education is codified in state policy SHLT-003? (2) What potential beliefs regarding these principles are embedded in the policy? Moreover, (3) What recommendations can enhance SHLT-003's accessibility and inclusivity?

Data Collection and Analysis

To systematically answer these research questions, the study followed a structured four-step procedural framework: (1) document retrieval and review, (2) keyword-based content analysis, (3) frequency analysis and thematic coding, and (4) gap identification and recommendations.

The first step involved retrieving the SHLT-003 policy document from the North Carolina Department of Public Instruction (NC DPI) and the State Board of Education (SBE) website. The full document was reviewed to establish a baseline understanding of its structure, scope, and thematic focus.

The second step consisted of a keyword-based policy content analysis to determine the extent to which SHLT-003 incorporates language from four guiding frameworks: Trauma-Informed Education (TIE), Culturally Responsive Education (CRE), Antiracist Frameworks, and Equity-Centered Practices. Keywords were derived from seminal literature in these areas (e.g., Kristin Souers, Bruce Perry, Ibram X. Kendi, Geneva Gay, and john a. powell). They were searched within SHLT-003 using a structured CTRL+F search tool. Keywords were iteratively defined through team discussions to ensure clear, comprehensive coverage across frameworks and precise alignment with seminal literature. Keyword searches were conducted independently and then discussed comparatively to ensure intercoder reliability. This process enabled the identification of explicit mentions and implicit references to key concepts and principles.

In the third step, a word frequency analysis and thematic coding process were conducted. The frequency of key terms was recorded, allowing for an assessment of how often and in what context relevant language appeared. Thematic coding was applied to categorize policy content under the four guiding frameworks, ensuring alignment with the study's research questions. This stage also helped determine whether SHLT-003 contained substantive commitments, procedural references, or omitted key concepts entirely. Furthermore, the analysis examined how SHLT-003 addressed mental health, stakeholder engagement, and implementation protocols.

The final step involved identifying policy gaps and making recommendations. Instances where key equity-driven, antiracist, or culturally responsive language was missing or underdeveloped were documented. The findings from the keyword

analysis and thematic coding were synthesized into recommendations to improve SHLT-003's accessibility and inclusivity.

To ensure clarity in the thematic analysis, this study developed a coding matrix that mapped each guiding framework to its conceptual definition, key scholars, and associated terminology. Table 2 outlines this framework, showing how SHLT-003 was evaluated against trauma-informed, culturally responsive, antiracist, and equity-centered best practices. This cross-framework analysis allowed for a more nuanced understanding of how SHLT-003 integrates or compartmentalizes different dimensions of equity-centered practices.

This methodological approach offers several advantages. First, it provides a systematic and transparent analysis, ensuring replicability and credibility. Furthermore, the multi-framework examination supported triangulation of findings as the policy language was examined through multiple lenses. Second, it focuses directly on policy language rather than relying on stakeholder perceptions, allowing for an objective assessment of what is codified in SHLT-003. Third, it helps identify gaps in language and implicit biases, highlighting areas where SHLT-003 may fall short in promoting trauma-informed, culturally responsive, and equity-driven education.

In conclusion, this study employs qualitative document analysis to systematically evaluate SHLT-003, using word frequency analysis and thematic coding to assess its alignment with trauma-informed, culturally responsive, antiracist, and equity-centered education frameworks. While Critical Policy Analysis (CPA) provides an equity-focused lens, further research is needed to explore how SHLT-003 was developed, whose voices influenced it, and how it is being implemented in practice. This methodology establishes a structured foundation for answering the research questions. It sets the stage for the Findings section, which will detail specific policy language patterns, thematic gaps, and recommendations for enhancing SHLT-003's inclusivity and accessibility.

FINDINGS

The following findings address Research Question 1, which examines the presence and frequency of equity-focused and culturally responsive language in SHLT-003.

Analysis of SHLT-003 Policy Language

Analysis of SHLT-003 through a culturally responsive and antiracist lens identified significant absences of words linked to racialized and systemic trauma. While the policy acknowledges the need for school-based mental health support, it fails to explicitly name racial, economic, and systemic barriers that shape students' experiences with trauma (Gorski, 2019; Ginwright, 2018). It does not mandate culturally responsive interventions and instead alludes to social and emotional strategies as part of prevention efforts and core instruction, leaving districts to interpret and implement mental health services in ways that may exclude students of color, LGBTQ+ youth, and immigrant students. In particular, the absence of explicit policy guidance on LGBTQ+ inclusion risks reinforcing heteronormative approaches

Table 2: Coding Framework for Policy Analysis

Framework	Definition	Seminal Authors	Referenced Words
Culturally Responsive Framework	An educational approach that integrates and values students' cultural backgrounds, experiences, and knowledge to foster academic success, cultural competence, and critical consciousness. It addresses cultural conflicts, affirms diverse identities, and uses students' and families' "funds of knowledge" as resources for meaningful and equitable learning, while challenging systemic inequities.	Gloria Ladson-Billings, Geneva Gay, Lisa Delpit, Christine Sleeter, Luis Moll	(cultural) Reciprocity, ethical, (cultural) influences, (Culturally) Relevant, multicultural, diverse
Antiracist Framework	A proactive commitment to identifying, challenging, and dismantling systemic racism and racial inequities through deliberate actions and policies that promote equity and justice. It requires confronting discomfort, embracing intersectionality, valuing differences, and fostering dialogue to advance collective social transformation.	Ibram X. Kendi, bell hooks, Audre Lorde, Beverly Daniel Tatum	Antiracist, antiracism, social justice, Decolonizing (practices), Decolonization, Inclusive, justice, equity, intersectionality

Equity Framework	A systems-based approach that addresses structural inequalities, leverages diverse cultural assets, and promotes inclusion through policies and practices that ensure fair access to opportunities and resources, particularly for marginalized communities. It integrates the skills to recognize and redress inequities while fostering transformative reforms that close opportunity gaps and affirm community strengths.	john a. powell, Paul Gorski, Linda Darling-Hammond, Tara J. Yosso, Pedro Noguera	Social justice, Anti-bias, fairness, disparity-reduction, disparity, disproportionality, inclusive, equity, inclusion, disrupt, barriers, equality, institutional, lingual, learner, ability, neuro, behavior, character, diverse, diversity, fair, marginalized, redress, reform
Trauma-Informed Education	An approach that recognizes the impact of trauma on learning and behavior, fostering safe, supportive, and relational environments that build resilience, promote healing, and support academic and social-emotional growth. It integrates whole-school practices, equips educators with tools to support students, and employs learner-centered strategies to meet the diverse needs of all students.	Kristin Souers, Susan Craig, Bruce Perry, Ross W. Greene, David Schonfeld, Romero, Robertson, Warner, Stephanie Jones, Joe Brummer	Mental, (social) emotional, trauma, restorative, resilience, empathy-driven practices, behavior, conduct, neuro, learner, relational

Note. The definitions and referenced words in this table are synthesized by the authors based on multiple key frameworks and scholars. The table represents an original synthesis and is not directly reproduced from any single source.

to mental health that can marginalize queer and transgender students (Ladson-Billings, 2021).

The document analysis reveals a complete absence of culturally responsive language. Terms such as "cultural," "culturally responsive," "equity," and "antiracist" do not appear anywhere in the policy text. The term "inclusion" appears only once, specifically in the context of procedural emergency planning: "inclusion of PSU in the local community emergency preparedness/response plan." In this context, the term refers to procedural inclusion rather than substantive equity-driven reform.

Word Frequency Analysis of SHLT-003

A word frequency analysis of SHLT-003 indicates a significant focus on trauma-informed education (TIE) language, particularly terms associated with mental health, social-emotional learning (SEL), and compliance-driven approaches. Equity-related terms, culturally responsive education references, and antiracist language are absent. The frequency and contextual use of key terms in SHLT-003 are summarized in Table 3.

The frequency analysis reveals that explicit references to "equity," "antiracist," or "culturally responsive" practices are entirely missing from SHLT-003. Where the term "inclusion" does appear, it is applied in a procedural and administrative context rather than being integrated into a substantive equity-based framework that guides implementation.

Table 3: Word Count Frequency and Presence of Equity-Focused Terms in SHLT-003

Term	Count	Context	Framework
Mental	47	Used in reference to program types, social-emotional connections, and implementation plans.	Trauma-Informed Education
Emotional	17	Always appears as part of "social and emotional" or "social-emotional."	Trauma-Informed Education
Prevention/ Preventative	10	Linked to universal prevention, suicide prevention, and best practices, but not systemic change.	Trauma-Informed Education

Learning/ Learner	6	Appears in reference to professional learning and SEL.	Trauma-Informed Education
Relational	6	Found in terms of relationships and supports, but only in procedural contexts.	Trauma-Informed Education
Conduct	2	Mentioned in reference to school liability, not student support.	Trauma-Informed Education
Cultural	0	No instances found	Culturally Responsive Framework
Culturally Responsive	0	No instances found	Culturally Responsive Framework
Equity	0	No instances found	Equity Framework
Inclusion	1	Found once, in a procedural phrase ("inclusion of PSU in the local community emergency preparedness/response plan").	Antiracist Framework
Antiracist	0	No instances found	Antiracist

*Note***.** The term counts and contextual descriptions in this table are based on the researchers' systematic document analysis of SHLT-003. The table represents an original synthesis and is not directly reproduced from any single source.

The analysis of SHLT-003 reveals that while it incorporates trauma-informed education (TIE), it does not explicitly address racial, cultural, or systemic dimensions of student trauma. These patterns are reflected across multiple equity frameworks reviewed. The following section outlines the specific equity framework gaps observed through document analysis. The following findings further address Research Question 1, specifically examining equity framework terminology in SHLT-003 (see Table 4).

Table 4: SHLT-003 Policy Gaps in Equity and Antiracist Language

Framework	Gaps Identified	Observed Context
Culturally Responsive	No references to cultural aspects, cultural responsiveness, or culturally relevant pedagogy. No explicit ties to student engagement or culturally sustaining practices.	Schools may lack guidance on applying culturally responsive teaching approaches within trauma-informed frameworks, limiting effectiveness for diverse student populations.
Antiracist	No mention of antiracism, racial justice, or systemic inequities. No references to addressing structural racism in educational settings.	The policy does not address how race intersects with trauma in education. Policy may overlook the systemic inequities that shape students' experiences, limiting its effectiveness.
Equity Practices	No accountability mechanisms for equity-driven implementation. No references to neurodivergence, linguistic equity, disability inclusion, or intersectional approaches.	Schools may implement inconsistently. Students with diverse learning needs may not be fully supported in policy implementation.
Trauma-Informed	No references to restorative justice, healing-centered engagement, or community-based healing strategies.	Misses opportunities to integrate comprehensive, culturally sustaining trauma-informed approaches that address root causes of systemic

Note. Gaps were identified through a systematic document analysis of SHLT-003, focusing on equity, antiracist, culturally responsive, and trauma-informed language, and synthesized to show observed omissions and their implications for policy effectiveness.

Identified Equity Framework Gaps in SHLT-003

Students of color, LGBTQ+ youth, and those from low-income communities disproportionately experience systemic trauma, yet education policies like SHLT-003 often fail to address the root causes of these inequities. A document analysis of equity-based education frameworks reveals a significant absence of anti-racist or culturally responsive language in trauma-informed policies, concerning inclusivity appearing only in a procedural context. Document analysis findings suggest that trauma-informed policies rarely incorporate culturally responsive or anti-racist frameworks. SHLT-003 contains no explicit references to equity, with the closest approximation being the single procedural reference to 'inclusion' in emergency planning contexts rather than as a guiding principle for intervention. This is evident in policy language, where references to cultural responsiveness and anti-racist principles are nearly absent. In contrast, terms related to procedural compliance and training requirements are prominent throughout the policy, reflecting its emphasis on administrative mandates rather than equity-driven approaches. The absence of explicit terminology across equity frameworks indicates that SHLT-003's provisions are mainly framed in universalist rather than targeted equity terms. In addition to language gaps, analysis of SHLT-003 highlighted several implementation-related challenges, described below. The following findings address Research Question 2, which examines the policy's implementation requirements and potential sources of variability. In addition to terminology patterns, the document analysis identified implementation-related issues.

Implementation Challenges

Leandro v. State of North Carolina (1997) ruled that financial disparities in the state's education system create opportunity gaps, affirming every child's right to a sound basic education. However, persistent inequities have been documented in prior state reports and litigation. The uneven implementation of trauma-informed initiatives reflects these disparities, with some districts developing comprehensive models while others engage in performative compliance (Love, 2019). Moreover, professional capacity varies widely across districts, with some schools having more access than others, leading to some schools having trauma-informed and culturally responsive staff and others having staff that only meet the most basic requirements for mental health support.

An analysis of SHLT-003's language reveals a mix of mandatory and discretionary terms, creating ambiguity in how trauma-informed education is implemented. The inconsistent use of terms like shall, must, should, encourage, and may introduces varying levels of obligation, leading to uneven policy application across school districts. Table 5 summarizes the frequency and application of key policy terms.

Table 5: Mandatory and Discretionary Language in SHLT-003

Language	Frequency	Application
Shall	22	Mostly tied to training format (e.g., length) vs content (e.g., culturally responsive strategies) for students and staff, as well as procedural review processes.
Must	4	Used exclusively for mental and social-emotional health support plans and training obligations.
Should	3	Applies to roles, relationships, and identified students, leaving room for interpretation.
Encourage	4	Appears in unmandated guidelines for mental health assessments and universal strategies.
May	8	Found in discussions of training, audits, and implementation flexibility, limiting enforcement.

Note. This table summarizes the frequency and contextual use of mandatory and discretionary terms in SHLT-003. "Mandatory" refers to policy language that establishes a binding requirement (e.g., "shall," "must"). In contrast, "discretionary" refers to language that allows flexibility or suggests, but does not require, action (e.g., "should," "encourage," "may"). Counts are based on a document analysis of the policy text as written at the time of review.

Despite the presence of some mandatory language, the frequent use of discretionary terms like "encourage" and "may" allows for inconsistent district-level implementation. For example, while mental health training for school personnel is mandated, the policy only encourages strategies for assessing mental and social-emotional health needs. Similarly, while public school units (PSUs) must develop mental health plans, they may choose to partner with external organizations for training, which requires funding and potentially affects the quality and consistency of delivery across the state.

The absence of enforceable provisions leads to fragmented and inconsistent application, with well-resourced districts implementing comprehensive trauma-informed programs. At the same time, underfunded schools struggle to meet even the minimum policy requirements (EdBuild, 2019). This variability of implementation results in variability in approaches to trauma-informed care across districts.

Another noted limitation in SHLT-003 is the lack of explicit references to student agency, cultural responsiveness, or intersectionality in its approach to trauma-informed education. SHLT-003 indicates that PSU plans "shall provide for engagement of relevant stakeholders", but does not provide critical guidance for implementing effective decision-making structures. These patterns in language contribute to inconsistent implementation and reinforce disparities between well-resourced and under-resourced districts.

DISCUSSION

In the absence of explicit commitments to culturally sustaining and antiracist trauma-informed education, SHLT-003 risks defaulting to a compliance-based model. This model reinforces Eurocentric, deficit-oriented perspectives on trauma and limits opportunities to empower students, families, and grassroots organizations essential to culturally responsive practice (Ahmed, 2012; Paris & Alim, 2017). This pattern is evident in the document analysis. TIE was the most frequently referenced framework, with trauma-informed terminology dominating the policy language. In contrast, cultural responsiveness and antiracist language are entirely absent from SHLT-003, with zero instances of these terms found in the policy text. This minimal overlap suggests that trauma-informed strategies are framed within a neutral or universalist paradigm, rather than one that explicitly addresses racialized or systemic trauma. These frequency counts and contextual uses illustrate a heavy reliance on procedural language with limited integration of culturally responsive or antiracist terminology.

Policy and Practice Implications

This imbalance indicates that SHLT-003 prioritizes mental health strategies while failing to make explicit commitments to cultural responsiveness and systemic equity. Without binding policy language, equity practices are treated as optional. The absence of binding language means equity practices are treated as optional. Without structural requirements, districts have significant discretion in how—or whether—to integrate culturally responsive and antiracist strategies.

Discretionary Language Implications

The discretionary language in SHLT-003—such as "encouraged to include" and "may incorporate"—weakens its potential for consistent, equity-driven implementation. The policy uses "encourage" (4 times) and "may" (8 times) in critical areas like mental health strategies. Stronger mandates—"shall" and "must"—appear 26 times but are primarily tied to training logistics and procedural compliance, not systemic change.

This imbalance allows uneven enforcement. Well-resourced districts may implement comprehensive trauma-informed practices. Underfunded schools—often those serving students most impacted by systemic trauma—may receive minimal support (Baker et al., 2021; Love, 2019). Such variability also limits the ability of community partners and grassroots organizations to collaborate on consistent, equity-focused implementation across districts. For SHLT-003 to move beyond symbolic

commitments, its language must reflect enforceable, equity-driven strategies. This includes replacing discretionary terms with requirements and embedding culturally responsive and antiracist approaches into every stage of implementation. The policy must also ensure that student, family, and community voices—including grassroots and advocacy organizations—are involved in both policy development and oversight. Targeted funding and clear accountability measures are needed to prevent disparities in implementation.

Recommendations for Reform

SHLT-003 must go beyond procedural mandates to embed structural accountability measures. These measures should center racial justice, community engagement, and relational healing practices. Policy revision requires explicitly naming systemic barriers such as racism, poverty, linguistic discrimination, and heteronormativity. This explicit naming signals that the policy acknowledges the structural nature of trauma, not just its symptoms.

The policy should also establish mechanisms for meaningful participation from students, families, and grassroots organizations in shaping mental health strategies. Evidence from education research shows that community-school partnerships improve both equity and fidelity of implementation (Ishimaru, 2019). Targeted funding should be allocated to ensure equity-driven provisions are fully implemented in under-resourced districts. Without these changes, trauma-informed education will remain inconsistent and inaccessible for many students who need it most.

Limitations

This study is limited by its focus on policy language analysis rather than implementation outcomes or decision-making processes. Document analysis alone cannot capture implementation realities, meaning that future studies should incorporate educator and policymaker perspectives through interviews or focus groups. Additionally, Critical Policy Analysis is applied at a limited scope in this study, focusing on policy text rather than the broader policymaking contexts, stakeholder influence, and historical policy trajectories that shape policy development. The findings are bound by the text of SHLT-003 as written at the time of review and may not capture local variations, subsequent revisions, or informal practices that shape implementation.

Future Research

Further studies should examine how SHLT-003 is implemented across diverse districts, with particular attention to differences in resources, leadership priorities, and community engagement. Comparative policy analysis across states could illuminate how other jurisdictions integrate equity, cultural responsiveness, and antiracist frameworks into trauma-informed education.

CONCLUSION

For trauma-informed education policies to be effective in dismantling educational inequities, they must be explicitly culturally responsive and antiracist. This requires naming systemic oppression in policy language, integrating culturally sustaining pedagogies, and ensuring that trauma-informed frameworks are rooted in community knowledge and student agency (Paris & Alim, 2017; Ginwright, 2018). SHLT-003 must move beyond vague commitments to student mental health by embedding structural accountability measures that guarantee culturally responsive and antiracist interventions in every school. Without this shift, trauma-informed education will remain an incomplete project. It will fail to address the conditions that produce student trauma in the first place (Tuck, 2009; Leonardo, 2022). To ensure SHLT-003 drives meaningful change, revisions must replace non-committal language with enforceable equity-driven mandates. Without these revisions, SHLT-003 risks reinforcing educational inequities rather than addressing them (Leonardo, 2022; Ginwright, 2018).

Strengthening Equity and Antiracist Commitments

Building on these findings, a critical revision of SHLT-003 must explicitly acknowledge the structural inequities that contribute to student trauma. Policies that fail to name racial, economic, and social oppression as root causes of trauma risk reinforcing a colorblind approach—one that treats all students the same without acknowledging structural barriers (Ladson-Billings, 2021; Leonardo, 2022). Therefore, the policy should include direct references to racial disparities in mental health access and disciplinary practices (Crenshaw, 1991; Noguera, 2021). It should also address the impact of economic deprivation on trauma and school readiness (Gorski, 2019). Furthermore, the policy should account for heteronormativity and the exclusion of LGBTQ+ students in traditional mental health interventions (Meyer, 2016). Policy revision should incorporate accountability metrics for tracking equitable and consistent implementation. These measures would help ensure that trauma-informed practices do not inadvertently reproduce the disparities they aim to address.

By including language that names these barriers explicitly, SHLT-003 would ensure that trauma-informed education is not only accessible but responsive to the lived realities of marginalized students. For instance, policy language could state: "Trauma-informed practices under SHLT-003 should address systemic barriers—including racism, poverty, and heteronormativity—to reflect the structural nature of trauma." Ultimately, the effectiveness of North Carolina's SHLT-003 and similar policies hinges on a commitment to dismantling systemic inequities and ensuring that trauma-informed care is equitable and accessible for all students.

Grassroots and Community Inclusion

Findings from this study highlight the absence of clear guidance on stakeholder engagement in SHLT-003. Future policy revisions and research should center the voices of students, families, educators, and grassroots organizations, whose lived experience and community knowledge are critical for crafting effective, culturally

sustaining trauma-informed approaches. Including these perspectives at every stage—from policy drafting to evaluation—would help ensure that SHLT-003 reflects the realities and needs of those most impacted by systemic trauma.

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