

Introduction

Central Connecticut State University (CCSU) is committed to both the letter and the spirit of the laws that encompass Equal Employment Opportunity and Affirmative Action. With the exception of the numerical workbooks, this Plan was developed under Affirmative Action Regulations, 46a-68-75 through 46a-68-94 inclusive. Per 46a-68-76, CCSU has opted to submit the AAP in paper copy. In compliance with the revised regulations in 46a-68-77, the AAP addresses all 16 elements required for submission and compliance.

The 2020 AA Plan was approved in February 2021. There was 1 element that was weak and the other sections were in compliance with the regulations and the following notations were made:

- 46a-68-80 – External Communication and Recruitment Strategies – The SBE/MBE report for the fourth quarter of fiscal year 2019/2020 has not been included in the Affirmative Action Plan. The required quarters must be included in every filing. Lines 2, 3, and 4 were not completed on the SBE/MBE report for fiscal year 2020/2021. The SBE/MBE reports for the required four quarters must be completed and submitted for every filing.
- 46a-68-89 - Discrimination Complaint Process – As was stated in the prior review and analysis report, time frames for filing, processing, and resolution of internal complaints are not to exceed ninety (90) days. External investigators must be made aware of this requirement. If exceeding this time frame is unavoidable, then the complainant must be informed again as the 90th day is approaching of his/her right to file a complaint with the CHRO, EEOC, etc. so that the time frames for filing with enforcement agencies are not exceeded.

These notations have been addressed in the AA Plan and their respective areas.

To achieve all lawful objectives, the University has developed the annual 2020-2021 Affirmative Action Plan, pursuant to section 46a-68 of the Connecticut General Statutes and the corresponding Affirmative Action Regulations for State agencies. The Plan follows the format set forth in the regulations and addresses each element therein.

With a deeply rooted belief in the principles of Affirmative Action and Equal Employment Opportunity, CCSU continually strives to provide all employees, current and prospective, every opportunity and possible benefit regarding their employment. Equally, CCSU continually strives to ensure that every student is afforded the highest standard of educational opportunity.

**Response to the
Commission on Human Rights and Opportunities Critique**

Pursuant to the Regulations of Connecticut State Agencies, Central Connecticut State University accepts the Commission on Human Rights and Opportunities' recommendation as voted on at its February 2021 meeting regarding the University's 2020 Affirmative Action Plan. This response addresses all proposals and/or recommendations made by the Commission.

Section	46a-68-80 – External Communication and Recruitment Strategies
PREVIOUS SUBMISSION:	Weak
RECOMMENDATIONS:	External Communication and Recruitment Strategies – The SBE/MBE report for the fourth quarter of fiscal year 2019/2020 has not been included in the Affirmative Action Plan. The required quarters must be included in every filing. Lines 2, 3, and 4 were not completed on the SBE/MBE report for fiscal year 2020/2021. The SBE/MBE reports for the required four quarters must be completed and submitted for every filing.
UNIVERSITY RESPONSE:	The University has included all the required SBE/MBE quarterly reports in Section 46a-68-80 – External Communication Section of this AAP. The University received a notice October 19, 2020 from DAS that they were unable to determine a Small/Minority Business goal for FY 20-21 because expenses exceeded funds available, and the University reported a “significant shortfall.” According to DAS, in that the expected expenses exceed the available funds, the DAS Supplier Diversity Unit was unable to determine a Small/Minority Business Goal for both FY20-21 and FY 21-22. Per the DAS instructions, the University has continued to report their quarterly spent with relation to S/MBE’s. Due to this, the University continues to submit reports without Lines 2, 3, and 4 filled out.
Section	46a-68-89 - Discrimination Complaint Process
PREVIOUS SUBMISSION:	Compliance
RECOMMENDATIONS:	As was stated in the prior review and analysis report, time frames for filing, processing, and resolution of internal complaints are not to exceed ninety (90) days. External investigators must be made aware of this requirement. If exceeding this time frame is unavoidable, then the complainant must be informed again as the 90th day is approaching of his/her right to file a complaint with the CHRO, EEOC, etc. so that the time frames for filing with enforcement agencies are not exceeded.
UNIVERSITY RESPONSE:	The University has examined the internal and external complaint filing, processing and resolution processes to be in compliance with CHRO, EEOC and other enforcement agencies filing requirements. The investigators are notifying the complainant(s) their right to file with external agencies before the ninety (90) day timeframe is exhausted. This will ensure all complainants know their rights to file with external agencies.



State of Connecticut Commission on Human Rights and Opportunities

Central Office – 450 Columbus Blvd Ste 2, Hartford CT 06103

Promoting Equality and Justice for all People

PROPOSED AFFIRMATIVE ACTION PLAN

Central Connecticut State University AGENCY

REVIEW AND ANALYSIS: A COMPARATIVE EVALUATION

INTRODUCTION

SECTION 46a-68-102. STANDARD OF REVIEW

- (a) To receive approved status, a plan must contain all elements required by Sections 46a-68-78 through 46a-68-94, inclusive.
- (b) Additionally, a plan shall be approved only if:
 - (1) the work force, considered as a whole and by occupational category, is in parity; or
 - (2) the agency has met all or substantially all of its hiring, promotion and program goals during the reporting period; or
 - (3) the agency has demonstrated every good faith effort to achieve such goals and, despite these efforts, has been unable to do so; and
 - (4) the agency has substantially addressed deficiencies noted by the Commission on Human Rights and Opportunities.

SECTION 46a-68-103. PLAN REVIEW AND ANALYSIS

As part of the review process, a written evaluation of the plan shall be prepared by Commission on Human Rights and Opportunities staff. Such evaluation shall:

1. assess the degree of procedural compliance with Regulations of CT State Agencies
2. identify and comment upon the deficiencies and weaknesses of the plan;
3. appraise the performance and effort of the agency in meeting its goals;
4. evaluate the effectiveness of the affirmative action program; and
5. suggest remedial action in addition to or in lieu of that proposed in the plan to achieve a balanced workforce and eliminate discriminatory practices.

Central Connecticut State University

SECTION 46a-68-78. Policy Statement

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

SECTION 46a-68-79. Internal Communication

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

SECTION 46a-68-80. External Communication and Recruitment Strategies

PREVIOUS SUBMISSION:

This section was weak in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient X Weak _____ In Compliance

PROPOSALS/RECOMMENDATIONS:

The SBE/MBE report for the fourth quarter of fiscal year 2019/2020 has not been included in the affirmative action plan. The required quarters must be included in every filing.

Lines 2, 3, and 4 were not completed on the SBE/MBE report for fiscal year 2020/2021.

The SBE/MBE reports for the required four quarters must be completed and submitted for every filing.

SECTION 46a-68-81. Assignment of Responsibility and Monitoring

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

Central Connecticut State University

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

SECTION 46a-68-82. Organizational Analysis

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

SECTION 46a-68-83. Work Force Analysis

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

SECTION 46a-68-84. Availability Analysis

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

SECTION 46a-68-85. Utilization Analysis and Hiring and Promotion Goals

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

Central Connecticut State University

SECTION 46a-68-86. Employment Analyses

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak In Compliance

SECTION 46a-68-87. Identification of Problem Areas

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak In Compliance

SECTION 46a-68-88. Program Goals

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak In Compliance

SECTION 46a-68-89. Discrimination Complaint Process

PREVIOUS SUBMISSION:

This section was weak in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak In Compliance

PROPOSALS/RECOMMENDATIONS:

As was stated in the prior review and analysis report, time frames for filing, processing, and resolution of internal complaints are not to exceed ninety (90) days. External investigators must be made aware of this requirement. If exceeding this time frame is

Central Connecticut State University

unavoidable, then the complainant must be informed again as the 90th day is approaching of his/her right to file a complaint with the CHRO, EEOC, etc. so that the time frames for filing with enforcement agencies are not exceeded.

SECTION 46a-68-90. Goals Analysis

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

SECTION 46a-68-91. Upward Mobility

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

SECTION 46a-68-93. Innovative Programs

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

SECTION 46a-68-94. Concluding Statement

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

CONCLUSION:

The proposed affirmative action plan submitted by Central Connecticut State University for the filing date of November 30, 2020 has been voted APPROVED.