GOOD FAITH EFFORTS  
Sec. 46a-68-92

An agency has demonstrated good faith efforts when it has engaged in the initiatives articulated in subsections (a) to (d), inclusive, of this section:

a) Promoted equal opportunity to achieve a workplace that is free of discrimination

1) Communicate the agency's commitment to equal employment opportunity and affirmative action to all employees

**CCSU's Effort:** Notification to employees’ provided via email of CCSU’s commitment to affirmative action and equal opportunity. The Affirmative Action Plans is available on the University’s web site; offices (Office of Diversity and Equity; President’s Office, Human Resources, Provost) and two copies of the plan are available in the CCSU library. An Executive Summary of the AAP that outlines the university achievement and hiring, promotions and programmatic goals for the 2018 plan year shared with administrators. Every search committee attended the required search charge meeting where EEO and affirmative action were addressed. Additionally, all event diversity related event materials feature that CCSU is an Equal Opportunity Educator and Employer (See internal communications section).

2) Ensure that employees are aware of nondiscrimination policies and procedures; post policies in a visible location

**CCSU’s Effort:** On March 19, 2018, an annual letter was emailed to employees notifying them of nondiscrimination policies and procedures, of the plan’s availability and encouraged them to review and comment on the plan. Employees with limited access to email provided a hard copy of the notice. Additionally copies of the Nondiscrimination and Anti-Harassment Policies, Complaint Procedures and On-campus and Community Resources booklets provided at New Student and Employee orientations, diversity, Title IX and sexual harassment trainings; and the booklets were distributed to several offices and buildings, e.g., ODE, Human Resources, and Student Affairs. More than 7,500 booklets containing the nondiscrimination and anti-harassment policies and complaint procedure distributed to students, faculty and staff.

3) Ensure that departmental processes, procedures, and systems are nondiscriminatory and free of bias

**CCSU’s Effort:** The Office of Diversity and Equity, the Office of Human Resources and supervisors continually review University and departmental policies and procedure. CCSU continues to implement its newly developed Title IX training, which includes sexual harassment, sexual violence, and stalking and intimate partner violence. Every employee asked to attend an annual Title IX training session where policies and procedures are distributed. As indicated in the Internal Communications section of the plan, all newly hired supervisory employees attended Title IX (sexual harassment prevention) training, which the CDO /designee provided.

4) Evaluate supervisors for making good faith efforts in equal employment opportunity and affirmative action; document in performance appraisals

**CCSU’s Effort:** Evaluation of supervisors are conducted on annual basis. Equal employment opportunity and affirmative action are important areas of consideration included in supervisory performance evaluations. Annual performance evaluations were conducted and completed for 26 Administrators during the plan period.

5) Ensure that reasonable accommodations are made for disabled employees
**CCSU’s Effort:** The reasonable accommodations procedures are posted on the ODE website and employees are provided with the reasonable accommodations to perform their essential job functions. During the reporting period, the following activity occurred to ensure that employees with disabilities were accommodated:

- ADA posters were put up throughout the campus identifying Rosa Rodríguez as the ADA coordinator for the university.
- ODE worked with supervisors and administrators to ensure appropriate accommodations have been provided to employees seeking such accommodations.
- Events requiring sign-language interpreters were coordinated through the office of Student Disability Services.
- The Facilities Planning Committee continuously evaluates barriers to entrance and access to campus for all persons, including those with disabilities.

6) **Take appropriate and timely action when there has been an allegation of sexual harassment**

**CCSU’s Effort:** Each year employees receive notice of the University’s Grievance Procedure. Almost all complaints filed, including those related to sexual harassment, were fully investigated and resolved within the required ninety-day (90) timeframe established in the procedure. Cases concluding beyond the 90-day timeframe were impacted by the availability of the complaining or responding party being available or on-campus to meet. In these cases, interim resolutions were sought to ensure timely response to such allegations. No complaining party’s right to file externally was hindered by the internal complaint process.

7) **Provide training to employees to enhance their knowledge of non-discrimination**

**CCSU’s Effort:** At least six (6) three-hour diversity sessions were provided, serving 143 employees, including approximately 15 student employees/leaders comprised of resident assistants, student workers and graduate assistants). The sessions focused on the law/policies, ADA, and a protected class, e.g., LGBT, hate crimes, religion, race and color, internal complaint procedures; external complaint agencies, and role-plays and scenario based activities. Additionally, three (3) additional sessions related to diversity were offered during the reporting period reaching 147 participants, of which 122 were student employees/leaders, and student resident assistants.

Title IX and sexual harassment training are also provided online. In addition to the Title IX and sexual harassment online trainings, at least one three-hour Title IX session and three one-hour training refresher sessions are scheduled each month on different days and times to allow for full participation.

Employees (ODE, Student Conduct, Police, and members of the SART committee) providing direct services to employees and students are provided additional in-depth training on issues related to Title IX and nondiscrimination. For example, this past year, the SART Team including investigators, received training/information on the CCSU’s climate survey results, preliminary data for sexual harassment employee survey, #metoo movement, CCSU prevention campaigns, case studies, “Offender Risk Factors – Static, Dynamic, and Acute.” The university makes every effort to provide training to key employees to ensure they effectively assist students, faculty and staff appropriately when dealing with issues of Title IX, discrimination and hate crimes.

The University’s newly established Employee Advisory Committee received training/information on the 2017 affirmative action plan, gender/sexual harassment climate survey, and the search process during the reporting period.
See the internal and external communications sections for detailed information and number served during this plan’s period.

b) Developed recruitment strategies that ensure opportunities for all qualified applicants, including underutilized groups

1) Identify affirmative action placement goals for all job openings.

**CCSU’s Effort:** The CDO or designee met with all search committees seeking to fill unclassified as well as classified vacancies to discuss various aspects of the search procedures, these discussions included recruitment strategies, which are tailored specifically to the recruitment of each position. Every search committee was notified of the affirmative action goals for their specific position and they were informed of the university’s committee to affirmative action and equal opportunity. At the beginning of every search, the search chair received written notice of the goals and a summary of the university process as well as a copy of the *CCSU Search and Hiring Manual*.

Recruitment strategies designed to ensure opportunities for all qualified applicants are integrated throughout the entire employment process. The University’s recruitment plan is designed to secure ongoing relationships and develop additional recruiting sources while cultivating recruitment programs, as required by the regulations.

The University made every good faith effort to achieve its hiring and promotional goals for every search. For every search that did not result in the achievement of an affirmative action goal, the university has established a detailed, searching and complete justification for all goal candidates from within that search.

See the external communications and goals analysis sections for detailed information and number served during this plan’s period.

2) Make efforts to attract a large and diverse pool of qualified applicants, particularly inclusive of groups associated with affirmative action recruitment goals.

3) Develop a contingency strategy if the initial recruitment effort does not bring in a sufficiently diverse pool.

4) Contacting special interest organizations, groups and individuals.

5) Or other means of outreach utilized to hire goal candidates.

**CCSU’s Effort:** The University advertises its job opening in a variety of publications; this plan year it placed ads in at least one hundred and fifteen (115) publications and listed positions with a variety of discipline related list servs. In addition, the University updated its list of recruitment sources and purchased annual subscriptions to *Highered.jobs.com* and *Diverse*. Purchasing these subscriptions allows the university to post unlimited advertisements for its positions.

When the applicant pool is small or does not reflect the diversity of the availability of workforce, other recruitment sources are identified and the posting date is extended. In some cases, faculty searches with small applicant pool or with no goal candidates, a new search will be conducted the following year.

Eight (8) searches “failed” during the reporting period and resulted in a decision being made to extend them or to start a new search. See external communication and goal analysis sections.
c) Ensured a fair and nondiscriminatory selection process

1) Review the selection process to ensure that it treats each applicant fairly and consistently.
2) Review the interview format and questions for possible bias.
3) Ensure reasonable accommodations for applicants.
4) If using a group interview process, create a diverse selection panel.
5) Assess all applicants using the same selection criteria.
6) Consider all skills that qualify the applicant, including volunteer and professional experience.
7) Interview as many applicants as possible to increase opportunity.
8) Keep written records of all applicants interviewed and be certain that the information recorded relates to the individual's ability to perform the duties.
9) Ensure that selection panel members are aware of the impact of common biases such as stereotyping, unsubstantiated first impressions that may influence a decision, and assessments based on different "comfort levels" with people of dissimilar groups.
10) Document the selection process fully. Retain all records.

CCSU’s Effort: Each search committee must include at least one minority search member and almost all are gender inclusive. The CDO ensured that whenever possible search committee members were diverse in both gender and race as this is an important component of the university’s recruitment strategy. In the unclassified search committees, 36.4 percent of the search committee members were people of color; 19% of search committees chairs were people of color. Additionally, 56 percent of search chairs were female. Once the search committee has evaluated the applicant pool, the Office of Diversity reviews all the finalists and goal candidates that are no longer being considered using the same criteria. Additionally, random selections of non-goal candidates are also reviewed. Normally ten or more candidates are interviewed for most positions; in some cases, over twenty-five candidates have been interviewed to achieve diversity of finalist pool. All search records (applicant materials, AAP forms including how applicants are assessed; copies of emails are maintained for a period of three years. For additional information see internal communications, applicant flow and goals analysis sections.

d) Provided career development opportunities to all interested and qualified employees, with emphasis on those groups found to be underutilized in the workforce

1) Encourage staff to participate on agency committees to enhance development.
2) Inform all staff of internal staff development and promotional opportunities.
3) Promote and support employee training and development for all employees.
4) Provide career counseling.

CCSU’s Effort: All employees are encouraged to participate in the university-wide committee, as well as departmental or office committees. All employees are required to attend diversity, Title IX (including sexual harassment training) as well as job specific training. Human resources, various departments, AAUP and SUOAF assist employees through funding and support staff development and training. Announcements of staff development and training opportunities occur annually (See internal communications and career mobility sections).
All positions are posted on the university website and posted on job opportunities boards for employees without computer access. Additionally, some collective bargaining agreements such as, SUOAF require that all their positions be posted internally before they are permitted to be posted externally.

Career counseling is available from the Office of Human Resources, Office of Diversity, Equity, and supervisors. (See career mobility section)

e) Nothing in this section shall be construed to absolve an agency of its obligations under sections 46a-68-78, 46a-68-79, 46a-68-80, 46a-68-81, 46a-68-85, 46a-68-87, 46a-68-89, and 46a-68-90 and 46a-68-92 of the Regulations of Connecticut State Agencies.