

**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 2020 meeting regarding the University's 2019 Affirmative Action Plan. This response addresses all proposals and/or recommendations made by the Commission.

<b>Section</b>	46a-68-78 – Policy Statement
<b>PREVIOUS SUBMISSION:</b>	Weak
<b>RECOMMENDATIONS:</b>	The Policy Statement was difficult to find in the proposed affirmative action plan. The policy statement belongs in this section of the proposed affirmative action plan not in Section 46a-68-80 External Communication.
<b>UNIVERSITY RESPONSE:</b>	The University has double checked to assure the Policy Statement is in the correct section of the Affirmative Action Plan.

<b>Section</b>	46a-68-80 – External Communication and Recruitment Strategies
<b>PREVIOUS SUBMISSION:</b>	Weak
<b>RECOMMENDATIONS:</b>	The SBE/MBE quarterly reports belong in this section of the proposed affirmative action plan not Section 46a-68-81 Assignment of Responsibility and Monitoring. There is no indication in this section that unions that represent university employees for collective bargaining purposes were notified that the university is an AA/EEO employer. Recruitment information should be in this section of the proposed affirmative action plan not Section 46a-68-81 Assignment of Responsibility and Monitoring. The Policy Statement and the notice inviting employees to review the affirmative action plan have been incorrectly placed in this section. Review Section 46a-68-80 of the Affirmative Action Regulations and the requirements of this section. The information that does not fulfill the requirements of this section of the Affirmative Action Regulations should be removed from future filings.
<b>UNIVERSITY RESPONSE:</b>	The University has put the SBE/MBE quarterly reports in Section 46a-68-80 – External Communication Section of this AAP. The University included CSCU is an AA/EEO employer in union notifications and it is included in the Affirmative Action Plan.

<b>Section</b>	46a-68-81 – Assignment of Responsibility
<b>PREVIOUS SUBMISSION:</b>	Compliance
<b>RECOMMENDATIONS:</b>	It is unclear as to why there are two Assignment of Responsibility and Monitoring sections. Future filings must contain only the requirements of this section of the Affirmative Action Regulations.

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<b>UNIVERSITY RESPONSE:</b>	The University has double checked to assure the Assignment of Responsibility contains all requirements of the Affirmative Action Regulations.
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<b>Section</b>	46a-68-86 – Employment Analyses
<b>PREVIOUS SUBMISSION:</b>	Compliance
<b>RECOMMENDATIONS:</b>	Exit questionnaires are not a requirement of the Affirmative Action Regulations.
<b>UNIVERSITY RESPONSE:</b>	The University has not included Exit questionnaires in this section of the Affirmative Action Plan.

<b>Section</b>	46a-68-88 - Program Goals-
<b>PREVIOUS SUBMISSION:</b>	Compliance
<b>RECOMMENDATIONS:</b>	The focus of the program goals must be on policies, procedures, etc. that affect the employees of Central Connecticut State University. Programs for the student body are laudable, but the focus of the Affirmative Action Regulations is on the employment process for state employees.
<b>UNIVERSITY RESPONSE:</b>	The University has examined the policies and procedures that affect the employees and not student focused. Program goals will be set according the Affirmative Action Regulations.

<b>Section</b>	SECTION 46a-68-89 - Discrimination Complaint Process -
<b>PREVIOUS SUBMISSION:</b>	Weak
<b>RECOMMENDATIONS:</b>	The 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. The Commission notes that two investigations took over five hundred days and there were zero (0) complaints filed with the Commission on Human Rights and Opportunities.
<b>UNIVERSITY RESPONSE:</b>	The University has examined the internal and external complaint filing, processing and resolution process to be in compliant with CHRO, EEOC and other enforcement agencies filing requirements.



# 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*

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## 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 \_\_\_\_\_ In Compliance

PROPOSALS/RECOMMENDATIONS:

The policy statement was difficult to find in the affirmative action plan. The policy statement belongs in this section of the proposed affirmative action plan not Section 46a-68-80 External Communication.

SECTION 46a-68-79. Internal Communication

PREVIOUS SUBMISSION:

This section was in compliance in the previous filing.

PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  In Compliance

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

PREVIOUS SUBMISSION:

This section was in compliance in the previous filing.

PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient  Weak \_\_\_\_\_ In Compliance

PROPOSALS/RECOMMENDATIONS:

The SBE/MBE quarterly reports belong in this section of the proposed affirmative action plan not Section 46a-68-81 Assignment of Responsibility and Monitoring.

There is no indication in the proposed affirmative action plan that unions that represent university employees for collective bargaining purposes were notified that the university is an AA/EEO employer.

Central Connecticut State University

Recruitment information should be in this section of the proposed affirmative action plan not Section 46a-68-81 Assignment of Responsibility and Monitoring.

The policy statement and the notice inviting employees to review the affirmative action plan have been incorrectly placed in this section.

Review Section 46a-68-80 of the Affirmative Action Regulations and the requirements of this section. The information that does not fulfill the requirements of this section of the Affirmative Action Regulations should be removed from future filings.

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

PREVIOUS SUBMISSION:

This section was in compliance in the previous filing.

PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  X  In Compliance

PROPOSALS/RECOMMENDATIONS:

It is unclear as to why there are two Assignment of Responsibility and Monitoring sections. Future filings must contain only the requirements of this section of the Affirmative Action Regulations.

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

Central Connecticut State University

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

SECTION 46a-68-86. Employment Analyses

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  X  In Compliance

PROPOSALS/RECOMMENDATIONS:

Exit questionnaires are not a requirement of the Affirmative Action Regulations.

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  X  In Compliance

Central Connecticut State University

SECTION 46a-68-88. Program Goals

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  X  In Compliance

PROPOSALS/RECOMMENDATIONS:

The focus of the program goals must be on policies, procedures, etc. that affect the employees of Central Connecticut State University. Programs for the student body are laudable, but the focus of the Affirmative Action Regulations is on the employment process for state employees.

SECTION 46a-68-89. Discrimination Complaint Process

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient  X  Weak \_\_\_\_\_ In Compliance

PROPOSALS/RECOMMENDATIONS:

The 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. The Commission notes that two investigations took over five hundred days and there were zero (0) complaints filed with the Commission on Human Rights and Opportunities.

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

Central Connecticut State University

SECTION 46a-68-91. Upward Mobility

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  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  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  In Compliance

CONCLUSION:

The proposed affirmative action plan submitted by Central Connecticut State University for the filing date of November 30, 2019 has been voted APPROVED.





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## PROPOSED AFFIRMATIVE ACTION PLAN

### Central Connecticut State University AGENCY

#### REVIEW AND ANALYSIS: A COMPARATIVE EVALUATION

#### INTRODUCTION

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#### 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 \_\_\_\_\_ In Compliance

PROPOSALS/RECOMMENDATIONS:

The policy statement was difficult to find in the affirmative action plan. The policy statement belongs in this section of the proposed affirmative action plan not Section 46a-68-80 External Communication.

SECTION 46a-68-79. Internal Communication

PREVIOUS SUBMISSION:

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PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  In Compliance

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

PREVIOUS SUBMISSION:

This section was in compliance in the previous filing.

PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient  Weak \_\_\_\_\_ In Compliance

PROPOSALS/RECOMMENDATIONS:

The SBE/MBE quarterly reports belong in this section of the proposed affirmative action plan not Section 46a-68-81 Assignment of Responsibility and Monitoring.

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Central Connecticut State University

Recruitment information should be in this section of the proposed affirmative action plan not Section 46a-68-81 Assignment of Responsibility and Monitoring.

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Review Section 46a-68-80 of the Affirmative Action Regulations and the requirements of this section. The information that does not fulfill the requirements of this section of the Affirmative Action Regulations should be removed from future filings.

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

PREVIOUS SUBMISSION:

This section was in compliance in the previous filing.

PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  X  In Compliance

PROPOSALS/RECOMMENDATIONS:

It is unclear as to why there are two Assignment of Responsibility and Monitoring sections. Future filings must contain only the requirements of this section of the Affirmative Action Regulations.

SECTION 46a-68-82. Organizational Analysis

PREVIOUS SUBMISSION:

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PRESENT SUBMISSION:

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SECTION 46a-68-83. Work Force Analysis

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PRESENT SUBMISSION:

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Central Connecticut State University

SECTION 46a-68-84. Availability Analysis

PREVIOUS SUBMISSION:

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PRESENT SUBMISSION:

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

PREVIOUS SUBMISSION:

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PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  X  In Compliance

SECTION 46a-68-86. Employment Analyses

PREVIOUS SUBMISSION:

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PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  X  In Compliance

PROPOSALS/RECOMMENDATIONS:

Exit questionnaires are not a requirement of the Affirmative Action Regulations.

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

PREVIOUS SUBMISSION:

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PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  X  In Compliance

Central Connecticut State University

SECTION 46a-68-88. Program Goals

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  X  In Compliance

PROPOSALS/RECOMMENDATIONS:

The focus of the program goals must be on policies, procedures, etc. that affect the employees of Central Connecticut State University. Programs for the student body are laudable, but the focus of the Affirmative Action Regulations is on the employment process for state employees.

SECTION 46a-68-89. Discrimination Complaint Process

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient  X  Weak \_\_\_\_\_ In Compliance

PROPOSALS/RECOMMENDATIONS:

The 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. The Commission notes that two investigations took over five hundred days and there were zero (0) complaints filed with the Commission on Human Rights and Opportunities.

SECTION 46a-68-90. Goals Analysis

PREVIOUS SUBMISSION:

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PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  X  In Compliance

Central Connecticut State University

SECTION 46a-68-91. Upward Mobility

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is \_\_\_\_\_ Deficient \_\_\_\_\_ Weak  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  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  In Compliance

CONCLUSION:

The proposed affirmative action plan submitted by Central Connecticut State University for the filing date of November 30, 2019 has been voted APPROVED.