

## 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 2018 AA Plan was approved in February 2019. All 16 elements were in compliance with the regulations and the following notations were made:

- 46a-68-78 – Policy Statement – The reference to the attached list of federal laws, regulations, guidelines, etc. must be removed since the list is no longer a requirement of the Affirmative Action Regulations.
- 46a-68-80 – External Communication and Recruitment Strategies – Only the SBE/MBE quarterly reports are required to fulfill the reporting mandate in this section.
- 46a-68-90 – Goals Analysis 46a-68-90 – Goals Analysis - Adequate justifications for not hiring goal candidates were provided in the Goals Analysis, however, the use of subjective phrases, adjectives, etc. must be avoided. For example, “deep”, “brief”, “strong”, and potential for growth” do not provide detailed information as to why a goal candidate was not hired or promoted

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

To achieve all lawful objectives, the University has developed the annual 2018-2019 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 2018 meeting and officially documented on October 29, 2018 (via email) regarding the University's 2017 Affirmative Action Plan. This response addresses all proposals and/or recommendations made by the Commission.

<b>Section</b>	46a-68-78 – Policy Statement
<b>PRESENT SUBMISSION:</b>	In compliance
<b>RECOMMENDATIONS:</b>	The reference to the attached list of federal laws, regulations, guidelines, etc. must be removed since the list is no longer a requirement of the Affirmative Action Regulations.
<b>UNIVERSITY RESPONSE:</b>	The University has updated our the Policy Statement to remove this reference line in the Affirmative Action Plan.

<b>Section</b>	46a-68-80 – External Communication and Recruitment Strategies
<b>PRESENT SUBMISSION:</b>	In compliance
<b>RECOMMENDATIONS:</b>	Only the SBE/MBE quarterly reports are required to fulfill the reporting mandate in this section.
<b>UNIVERSITY RESPONSE:</b>	The University has submitted only the required SBE/MBE quarterly reports in the Affirmative Action Plan.

<b>Section</b>	46a-68-90 – Goals Analysis
<b>PRESENT SUBMISSION:</b>	In compliance
<b>RECOMMENDATIONS:</b>	Adequate justifications for not hiring goal candidates were provided in the Goals Analysis, however, the use of subjective phrases, adjectives, etc. must be avoided. For example, “deep”, “brief”, “strong”, and potential for growth” do not provide detailed information as to why a goal candidate was not hired or promoted.
<b>UNIVERSITY RESPONSE:</b>	The University has omitted subjective language, phrases and adjectives in the Affirmative Action Plan.



**State of Connecticut**  
**COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES**

Central Office - 450 Columbus Boulevard, Suite 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.



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Central Office - 450 Columbus Boulevard, Suite 2, Hartford, CT 06103

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**SENT VIA EMAIL**

March 20, 2019

Dr. Zulma R. Toro, President  
Central Connecticut State University  
1615 Stanley Street  
New Britain, CT 06050

**RE: 2019 Affirmative Action Plan - APPROVED**

Dear Dr. Toro:

Pursuant to Section 46a-68(d) of the general statutes, the Commission on Human Rights and Opportunities has reviewed the proposed affirmative action plan submitted by Central Connecticut State University on November 30, 2018. The Commission at its regular meeting on February 13, 2019 voted that the plan be **APPROVED**.

The review and analysis of the proposed affirmative action plan was performed in accordance with Section 46a-68-103 and is transmitted herewith. **THE SCHEDULED DATE FOR YOUR NEXT FILING is November 30, 2019.**

The Commission requests that the attached evaluation be thoroughly reviewed to ensure that all deficiencies, omissions, and errors identified in the Evaluation be addressed.

For technical assistance or if you have any questions you may contact Neva Elaine Vigezzi, CHRO Representative at 860-541-4706.

Sincerely,

Tanya A. Hughes  
Executive Director

Attachment

C: Neva Elaine Vigezzi, CHRO Representative

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

PROPOSALS/RECOMMENDATIONS:

The reference to the attached list of federal laws, regulations, guidelines, etc. must be removed since the list is no longer a requirement of the Affirmative Action Regulations.

SECTION 46a-68-79. Internal Communication

PREVIOUS SUBMISSION:

This section was in compliance in the previous 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 in compliance in the previous filing.

PRESENT SUBMISSION:

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

PROPOSALS/RECOMMENDATIONS:

Only the SBE/MBE quarterly reports are required to fulfill the reporting mandate in this section.

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

PREVIOUS SUBMISSION:

This section was in compliance in the previous 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  X  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  X  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  X  In Compliance

SECTION 46a-68-89. Discrimination Complaint Process

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-68-90. Goals Analysis

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

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

PROPOSALS/RECOMMENDATIONS:

Adequate justifications for not hiring goal candidates were provided in the goals analysis, however, the use of subjective phrases, adjectives, etc. must be avoided. For example, "deep", "brief", "strong", and "potential for growth" do not provide detailed information as to why a goal candidate was not hired or promoted.

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



Central Connecticut State University

CONCLUSION:

The proposed affirmative action plan submitted by Central Connecticut State University for the filing date of November 30, 2018 has been voted APPROVED.