



U.S. Department of Justice

Office of Justice Programs

Office for Civil Rights

Washington, D.C. 20531

June 28, 2021

Carolyn Kozak
Human Resources Generalist 3
Connecticut Office Of Policy And Management
450 Capitol Avenue
Hartford, CT 06106

Re: Equal Employment Opportunity Plan (EEOP) Utilization Report for Connecticut Office Of Policy And Management, 21-OCR-1143

Dear Ms. Kozak,

The Office for Civil Rights, Office of Justice Programs, has reviewed and approved the Equal Employment Opportunity Plan (EEOP) Utilization Report that you submitted in accordance with the grant conditions set forth by either the Omnibus Crime Control and Safe Streets Act of 1968 (Safe Streets Act), Juvenile Justice and Delinquency Prevention Act of 1974, the Victims of Crime Act of 1984 or their implementing regulations. The approval of your EEOP Utilization Report is effective for two years from the date of this letter, and satisfies the EEOP reporting requirement for all open Department of Justice (DOJ) awards during the two-year period.

Your organization may, however, have additional civil rights compliance requirements if it receives funding from grant programs other than the ones listed above. For example, if your organization is a recipient of funding from the Office on Violence Against Women (OVW), your organization's non-discrimination policies and practices should also include prohibitions on discrimination on the bases of actual or perceived sexual orientation and gender identity.

If you have any questions regarding this matter, please contact the Office for Civil Rights at (202) 307-0690.

Sincerely,

X *Michael L. Alston*

Michael L. Alston
Director
Signed by: Michael Alston

EEO Utilization Report

Organization Information

Name: Connecticut Office Of Policy And Management

City: Hartford

State: CT

Zip: 06106

Type: State Government (not law enforcement)

Step 1: Introductory Information

Policy Statement:

It is the continuing policy of the Office of Policy and Management (OPM) to achieve equal employment of individuals without consideration of race, color, religious creed, age, sex, gender, gender identity or expression, marital status, sexual orientation, national origin, ancestry, intellectual disability, physical disability (including, but not limited to, blindness), learning disability, past or present history of mental disability, status as a veteran, or a criminal record unless the provisions of Sections 46a-60(b) and 46a-80(b) of the Connecticut General Statutes are controlling, or there is a bona fide occupational qualification excluding persons in one of the above protected groups. OPM shall not deprive an employee of employment, penalize or threaten or otherwise coerce an employee with respect to employment because the employee is a victim of family violence, as defined in Section 46b-38a of the Connecticut General Statutes. OPM will not request nor require genetic information from job applicants or employees, or otherwise discriminate against any person in employment conditions on the basis of genetic information. In order to continue to make every good faith effort to achieve parity in the workforce, the agency utilizes Affirmative Action measures in the areas of recruitment, training, tuition reimbursement, compensation, benefits, promotions, employee evaluations, transfers, layoffs and terminations. To ensure employee well-being, OPM has established the Human Rights Complaint Procedure for any employee who believes they have been discriminated against with regard to employment or to any program, service, or activity at the agency.

Copies of pertinent policies are posted in central locations and are available upon request.

Step 4b: Narrative of Interpretation

1. A review of Utilization Analysis reflects the following goals for representation by race/gender by category:

	White Males/Females	All Other
Officials:	86%	14%
Professionals:	82%	18%
Technicians:	77%	23%
Administrative:	76%	24%

Achieving parity to the goals would result in a workforce with limited diversity, so OPM set an objective to increase its representation of minorities.

2. Black males, & Hispanic & Asian females are not represented in the Officials category (which includes senior level managers); in comparison to the relevant labor market the underrepresentation is (-2%), (-2%), (-1%), respectively.

3. Hispanic, Black, & Asian male & females were represented in the Professionals category. Asian males in comparison to the relevant labor market were underrepresented by (-2%).

4. White females were underrepresented in the Administrative category (-21%), an increase over the (-11%) underrepresentation in the 2019 Report; & White males were underrepresented in the following: Administrative (-20%) & Professionals (-11%). The Professionals category underrepresentation was (-2) in the 2019 Report. The underrepresentation may be misleading as these significant changes are due to a centralization initiative which occurred during the reporting period, resulting in the transfer of 47 previously hired labor relations employees into OPMs workforce, which significantly increased OPMs workforce including approximately a 43% representation of Black, Hispanic & Asian employees. As a result, the underrepresentation of Whites increased while the overrepresentation of Hispanics & Black employees increased.

The agency is committed to equal employment opportunities & having a workforce that is both representative of the labor market in the community as well as racially diverse.

Step 5: Objectives and Steps

1. Based on the results of the under-utilization identified in Step 4b, OPM has established the following objectives to address the largest areas of under-utilization. It is a goal of OPM to increase representation of White females in the Administrative Support job category and White males in the Professionals and Administrative Support job categories.

- a. Continue recruitment efforts to attract underrepresented groups in OPMs workforce as applicants. Examples include posting on OPMs website, on the States online employment center, JobAps, which posts jobs on Twitter, Indeed, Facebook, LinkedIn & Pinterest. During this reporting period posted jobs on Handshake, where we partnered w/ 53 colleges/universities to reach college grads & alumni, 32 (60%) of which are historically Asian, Hispanic/Latino, or Black/African American colleges/universities. When jobs are open to the public, post on the Dept. of Labor's website; contact resources directly via email about jobs that are open to the public; & also place print ad in local minority newspaper. OPMs recruitment resource list contains 85 organizations including NAACP, local Urban Leagues, Commission on Equity & Opportunity, local colleges/universities, Community Action agencies, Womens Centers across the State, Asian American Community, Latino & Puerto Rican Affairs Community & CT Assoc of Diversity & Equity Professionals
- b. Continue contacts with organizations such as the NAACP, the Urban League and the Commission on Equity and Opportunity, in an effort to cultivate a successful outreach recruitment program.
- c. Continue to review job specifications to assure that they accurately reflect the duties and responsibilities of the job to ensure there are no barriers or adverse impact to both current employees and potential applicants.
- d. Continue to monitor & guide the agency's hiring process to determine viability of its procedures & ensure there are no barriers or adverse impact to staff seeking promotional opportunities & to job applicants. EEO provides training to search committees to minimize biases such as; requiring search committee to identify the preferred tangible skills before the employment search begins; working with the search committee to reach a vast group of relevant recruitment sources to obtain the most diverse & qualified applicant pool possible; instruct how to select candidates for interviews based upon the pre-determined criteria; require that the interview questions are pre-approved by the Designated EEO Officer before the interviews begin to ensure questions being asked are appropriate, consistent, &

do not provide an opportunity to allow for any bias in the decision making process; & work w/ the search committee to select a diverse interview panel. EEO also proctors all 1st round interviews.

- e. Continue to monitor and guide the agencies interview hiring process to determine the viability of its procedures.
- f. Continue to maintain an increased involvement of the Designated EEO Officer / Human Resources representative in the applicant flow process i.e., review résumé/application packages and make recommendations for qualified candidates to be interviewed.
- g. Continue to reach out to underutilized groups on the employment and/or re-employment lists.
- h. Obtain agency head approval for all preferred criteria listed on job postings before any job is posted, and approval to interview the most qualified applicants before each interview commences.
- i. Continue to provide all OPM staff, via agency-wide email, with information about internal job vacancies.

2. Based on the results of the under-utilization analysis conducted in Step 4b, OPM has established the following objectives to continue efforts to increase representation of minorities in its workforce. It is the goal of OPM to increase the representation of Black or African American males, Asian females and Hispanic or Latino females in the Officials/Administrators category, and to increase representation of Asian males in the Professionals category.

- a. Continue recruitment efforts to attract underrepresented groups in OPMs workforce as applicants while balancing with diversity goals and the most candidates. Examples include post jobs on OPMs website; partner with the Dept. of Labor to post jobs that are open to the public; post jobs on the States online employment center, JobAps, which posts jobs for the State of CT on the States website as well as on Twitter, Indeed, Facebook, LinkedIn & Pinterest; & contact resources directly via email of all jobs that are open to the public. OPM posted relevant jobs on Handshake, where we partnered with 53 colleges & universities across the country to reach recent college grads & alumni of our jobs. OPMs recruitment resource list contains 85 statewide organizations including local Urban Leagues, the Commission on Equity & Opportunity, local colleges/universities, Community Action agencies, Womens Centers across the State, & the CT Association of Diversity & Equity Professionals.
- b. Continue to review job specifications to assure that they accurately reflect the duties and responsibilities of the job to ensure there are no barriers or adverse impact to both current employees and potential applicants.
- c. Continue to provide all OPM staff, via agency-wide email, with information about internal job vacancies.
- d. Continue contacts with organizations such as the NAACP, the Urban League and the Commission on Equity and Opportunity, in an effort to cultivate a successful outreach recruitment program.
- e. Continue to Monitor/guide OPMs hiring process to determine viability of its procedures & ensure there are no barriers or adverse impact to staff seeking promotional opportunities or to job applicants. The Designated Equal Employment Opportunity (EEO) Officer provides training to search committees to minimize biases such as; require the search committee to identify preferred tangible skills before the job search begins; work w/ the search committee to reach a vast group of relevant recruitment sources to obtain the most diverse & qualified applicant pool; instruct how to select candidates for interviews based upon pre-determined criteria; require interview questions are pre-approved by EEO before interviews begin to ensure questions asked are appropriate, consistent & dont provide opportunity for any bias in the decision making process; work w/ the search committee to select a diverse interview panel; EEO also proctors first round interviews when time permits to ensure consistency.
- f. Continue to maintain increased involvement of the Designated EEO Officer / Human Resources representative in the applicant flow process i.e., review résumé/application packages and make recommendations for qualified candidates to be interviewed.
- g. Continue to reach out to underutilized groups on the employment and re-employment lists.
- h. Obtain agency head approval for all preferred criteria listed on job postings before any job is posted, and approval to interview the most qualified applicants before each interview commences.

Step 6: Internal Dissemination

- a. Continue to post in a central location and make available to all employees via the agencies Intranet the agencies Equal Employment Opportunity Plan Utilization Report approved by the US Department of Justice, the agencies Affirmative Action policy statements, complaint procedure and annual hiring, promotion and program objectives.
- b. Continue to advise all employees of their right to review the agencies Affirmative Action Plan and to encourage them to

submit written comments. Employees are provided an electronic copy via email of the Affirmative Action Plan and the Equal Employment Opportunity Plan Utilization Report approved by the US Department of Justice. Hard copies of both the Equal Employment Opportunity Plan Utilization Report approved by the US Department of Justice and the Affirmative Action Plan are available in the Human Resources / Equal Employment Opportunity Office and are posted on the agency's Intranet.

c. Continue to provide information to staff about internal job vacancies, via email and posting on the agency's Intranet.

d. Continue to provide the Secretary, Deputy Secretary, Division Heads, and key personnel with a regular report assessing the agency's achievement of objectives and other relevant information regarding Affirmative Action.

e. Continue to advise all employees of their right to review the Equal Employment Opportunity Plan Utilization Report and to encourage them to submit written comments.

f. Continue to provide hard copy of the Equal Employment Opportunity Plan Utilization Report approved by the US Department of Justice to staff upon request.

Step 7: External Dissemination

a. Continue expanded recruitment practices including targeted news media & professional journals, & one-on-one communication w/ representatives of the NAACP, the Urban League, & the Commission on Equity & Opportunity to cultivate a successful outreach program.

b. Continue to update the agency's listing of minority recruitment resources.

c. Continue to provide a copy of OPM's Affirmative Action (AA) Plan to unions which represent OPM's employees & invite such unions to review & comment on the agency's AA Plan.

d. Continue to include the statement OPM is an Equal Opportunity Employer on all job applications, job announcements & envelopes.

e. Continue to make the Equal Employment Opportunity Plan Utilization Report approved by the US DOJ (EEO) available to the public, including vendors & contractors, by posting such Report on OPM's Internet (in the About OPM Section w/in our Division Links section) & include statements online that a hard copy of the report will be made available upon request by the EEO.

f. Continue to provide hard copy of EEO to members of the public, including contractors & vendors, upon request.

g. Continue to include nondiscrimination & affirmative action provisions in its contracts, in accordance w/ Connecticut General Statutes Sections 4a-60 & 4a-60a. Continue to notice grantees (& all of their sub grantees) who receive federal funds that they will comply w/ the nondiscrimination requirement of Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973 as amended; & Title II of the Americans with Disabilities Act of 1990, to the effect that no person shall, on the grounds of race, color, national origin, age, sex, or disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under, or denied employment in connection w/ any program or activity funded in whole or in part w/ funds made available in said grant

Utilization Analysis Chart
Relevant Labor Market: Connecticut

Job Categories	Male							Female								
	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other
Officials/Administrators																
Workforce #/%	13/46%	2/7%	0/0%	0/0%	2/7%	0/0%	0/0%	0/0%	9/32%	0/0%	2/7%	0/0%	0/0%	0/0%	0/0%	0/0%
CLS #/%	119,050/52%	5,590/2%	5,360/2%	110/0%	5,830/3%	0/0%	690/0%	465/0%	78,985/34%	4,800/2%	5,495/2%	130/0%	3,235/1%	50/0%	725/0%	520/0%
Utilization #/%	-5%	5%	-2%	-0%	5%	0%	-0%	-0%	-2%	-2%	5%	-0%	-1%	-0%	-0%	-0%
Professionals																
Workforce #/%	24/26%	4/4%	3/3%	1/1%	1/1%	0/0%	0/0%	0/0%	39/41%	4/4%	16/17%	0/0%	2/2%	0/0%	0/0%	0/0%
CLS #/%	135,175/37%	6,860/2%	9,190/2%	180/0%	12,835/3%	0/0%	1,045/0%	765/0%	166,995/45%	10,340/3%	12,755/3%	145/0%	9,590/3%	65/0%	1,520/0%	745/0%
Utilization #/%	-11%	2%	1%	1%	-2%	0%	-0%	-0%	-4%	1%	14%	-0%	-0%	-0%	-0%	-0%
Technicians																
Workforce #/%	1/100%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
CLS #/%	16,680/34%	1,365/3%	1,350/3%	45/0%	1,565/3%	0/0%	145/0%	75/0%	21,360/43%	1,850/4%	3,000/6%	35/0%	1,100/2%	100/0%	260/1%	185/0%
Utilization #/%	66%	-3%	-3%	-0%	-3%	0%	-0%	-0%	-43%	-4%	-6%	-0%	-2%	-0%	-1%	-0%
Protective Services:																
Sworn																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	19,910/66%	2,665/9%	2,915/10%	75/0%	175/1%	0/0%	185/1%	70/0%	2,555/8%	535/2%	1,035/3%	25/0%	25/0%	0/0%	100/0%	15/0%
Utilization #/%																
Protective Services: Non-sworn																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
Civilian Labor Force #/%	1,535/38%	235/6%	215/5%	4/0%	0/0%	0/0%	45/1%	15/0%	1,390/35%	145/4%	300/8%	0/0%	10/0%	30/1%	49/1%	20/1%
Utilization #/%																
Administrative Support																
Workforce #/%	1/7%	0/0%	1/7%	0/0%	0/0%	0/0%	0/0%	0/0%	4/29%	2/14%	6/43%	0/0%	0/0%	0/0%	0/0%	0/0%

Job Categories	Male							Female								
	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other
CLS #/%	124,890/2 7%	15,080/3 %	14,090/3 %	395/0%	5,380/1%	80/0%	1,040/0%	910/0%	224,165/4 9%	29,515/6 %	27,710/6 %	340/0%	6,375/1%	215/0%	2,945/1%	1,605/0%
Utilization #/%	-20%	-3%	4%	-0%	-1%	-0%	-0%	-0%	-21%	8%	37%	-0%	-1%	-0%	-1%	-0%
Skilled Craft																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	106,105/7 4%	18,950/13 %	6,420/4%	265/0%	1,775/1%	0/0%	900/1%	1,285/1%	5,500/4%	1,385/1%	595/0%	0/0%	355/0%	20/0%	50/0%	30/0%
Utilization #/%																
Service/Maintenance																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	143,040/3 4%	49,865/12 %	25,755/6 %	415/0%	8,155/2%	45/0%	1,835/0%	2,020/0%	114,260/2 7%	37,010/9 %	28,070/7 %	295/0%	8,430/2%	160/0%	2,115/0%	2,160/1%
Utilization #/%																

Significant Underutilization Chart

Job Categories	Male						Female									
	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other
Professionals	✓															

I understand the regulatory obligation under 28 C.F.R. ~ 42.301-.308 to collect and maintain extensive employment data by race, national origin, and sex, even though our organization may not use all of this data in completing the EEO Utilization Report.

I have reviewed the foregoing EEO Utilization Report and certify the accuracy of the reported workforce data and our organization's employment policies.

Certified As Final By: Melissa McCaw

OPM Secretary

06-07-2021

[signature]

[title]

[date]