

# **Annual Report to the Connecticut General Assembly and Governor**



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## **AFFIRMATIVE ACTION PLAN DATA REPORT**

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**FY 2025**

Introduction

The Connecticut Commission on Human Rights and Opportunities (CHRO) is responsible for the enforcement of the state’s Affirmative Action Statutes, CONN. GEN. STAT. §§ 46a-68 to 46a-68k, inclusive. Under CONN. GEN. STAT. § 46a-68(b), each state agency, department, board, and commission is required to develop and implement, in cooperation with the CHRO, an affirmative action plan that commits the agency, department, board or commission to a program of affirmative action in all aspects of personnel and administration. This plan is intended to ensure that affirmative action is undertaken as required by state and federal law to ensure equal employment opportunities for all. It is the executive head of each such agency, department, board or commission that is directly responsible for the development, filing, and implementation of such affirmative action plan.

Once a plan is filed, it is then the CHRO’s responsibility to review and recommend each plan for disapproval, conditional approval, or approval by the Commissioners. This review is guided by the relevant statutes and regulations of the Commission. Once CHRO staff make a recommendation, the CHRO Commissioners take that recommendation into consideration and vote on the final approval status of each plan.

This report focuses on the Affirmative Action Plans reviewed and voted on during the 2025 fiscal year, covering the period of July 1, 2024 to June 30, 2025.

Frequency of Filing

CONN. GEN. STAT § 46a-68(c) stipulates the frequency in which an agency must file an Affirmative Action Plan based on the size of the agency. For state agencies with less than 25 employees, there is no need to file an Affirmative Action Plan. State agencies that employ more than 25 people, but less than 250, must file biennially. All agencies that employ more than 250 people are statutorily required to file annually. However, if any agency shows a pattern of noncompliance, they may be asked to file semi-annually, regardless of their size.

Size of Agency	Frequency of Filing
0-25 Employees	No Need to File
26-249 Employees	Biennial*
250+ Employees	Annual*

\*Agency may also be asked to file semi-annually if they show a pattern of non-compliance

The Process

The process that an agency must follow in order to submit an Affirmative Action Plan that will likely be recommended for approval by CHRO staff and approved by Commission vote is clearly stated in Sec. 46a-68-76 to 46a-68-114, inclusive. Agencies will typically have their designated equal employment opportunity officer prepare the affirmative action plan. That officer will begin by compiling the

demographic data of their workforce and of those they have considered in any hiring or promotions. A report is then compiled that must meet the CHRO's statutory and regulatory requirements. When the report is complete, it gets sent to the CHRO Affirmative Action (AA) Unit. Next, that Unit reviews the report and notifies the agency of any deficiencies. The agency then has an opportunity to correct those deficiencies by themselves or with the help of the AA unit. The finalized draft is submitted to the CHRO where it gets reviewed for a recommendation. That recommendation and the plan are then submitted to the CHRO's Commissioners at the monthly Commission meeting.

CONN. GEN. STAT. § 46a-68(b)(2), provides that the CHRO shall remain available to give training and technical assistance to each agency's equal employment officer for plan development and implementation. The CHRO holds one-day training sessions open to all equal employment opportunity officers in order to help each agency understand the state agency regulations. The CHRO is also available to help each agency to address agency-specific plan deficiencies. Each agency can find their existing plan deficiencies in their CHRO issued plan evaluation which will contain a directive to seek technical assistance in the specified deficient areas.

While Sec. 46a-68-106 requires the CHRO to provide this training, each agency is not statutorily required to complete it. The CHRO shall provide training only if the agency seeks it from them by request. Otherwise, the agency will be solely responsible for completing their Affirmative Action Plan and submitting it on time.

## **State Agency Affirmative Action Plan Approval Requirements**

In order for an agency's Affirmative Action Plan to be approved, the plan must comply with Regs. Conn. State Agencies § 46a-68-102(a), § 46a-68-102(b)(4) and fulfill at least one of the § 46a-68-102(b)(1-3) requirements.

Sec. 46a-68-102(a) provides that a plan must "contain all elements required by sections 46a-68-76 to 46a-68-114, inclusive, of the Regulations of Connecticut State Agencies." Regs. Conn. State Agencies § 46a-68-102.

In order to comply with Sec. 46a-68-102(b)(4) (Deficiencies), an agency must have addressed any and all deficiencies noted by the Commission on Human Rights and Opportunities in its review of the previously filed plan. In their new Affirmative Action Plan, agencies typically show the ways in which they have addressed the deficient areas of their previous plan. They may also file a separate report prior to the submission of their next plan enumerating the actions taken to remedy the deficiencies.

Regs. Conn. State Agencies § 46a-68-102(b)(1) (Parity) requires that the agency's "workforce, considered as a whole or by occupational category, be in parity" with the relevant labor market. The relevant labor market currently stems from appropriate data sources including, but not limited to, the U.S. Census, labor statistics, and any other appropriate sources.

In order to comply with Sec. § 46a-68-102(b)(2) (Goals), an agency must have “met all or substantially all of its hiring, promotion, and program goals during the reporting period.” Hiring, promotion and program goals are set by each agency according to the agency’s ability to grow in a given occupational category. If an agency does not have an opening in the relevant goal area during the reporting period, then there will be no goal set in that area. There is no precise percentage as to when the goals have been substantially fulfilled. Instead, this determination depends on how many opportunities there were over the course of the plan’s period.

Sec. 46a-68-102(b)(3) (Good Faith) requires that a state agency demonstrate a good faith effort to achieve their hiring, promotion, and program goals. In order to fulfill this requirement, the agency must show that they have made every attempt to fulfill their goals, yet were still unable to do so. This includes demonstrating that applicants were treated fairly and consistently throughout the hiring process, that this process relied on objective criteria, and that any barriers to participation in the hiring process were removed or mitigated.

## **Diversity Training and Education Requirements**

Pursuant to CONN. GEN. STAT. § 46a-54(16), each state agency must provide a minimum of three hours of diversity training and education to all supervisory and nonsupervisory employees. The training and education must include information concerning the federal and state statutory provisions concerning discrimination and hate crimes directed at protected classes and remedies available to victims of discrimination and hate crimes, standards for working with and serving persons from diverse populations and strategies for addressing differences that may arise from diverse working environments. Agencies must also submit an annual report to the Commission concerning the status of the required diversity training and education.

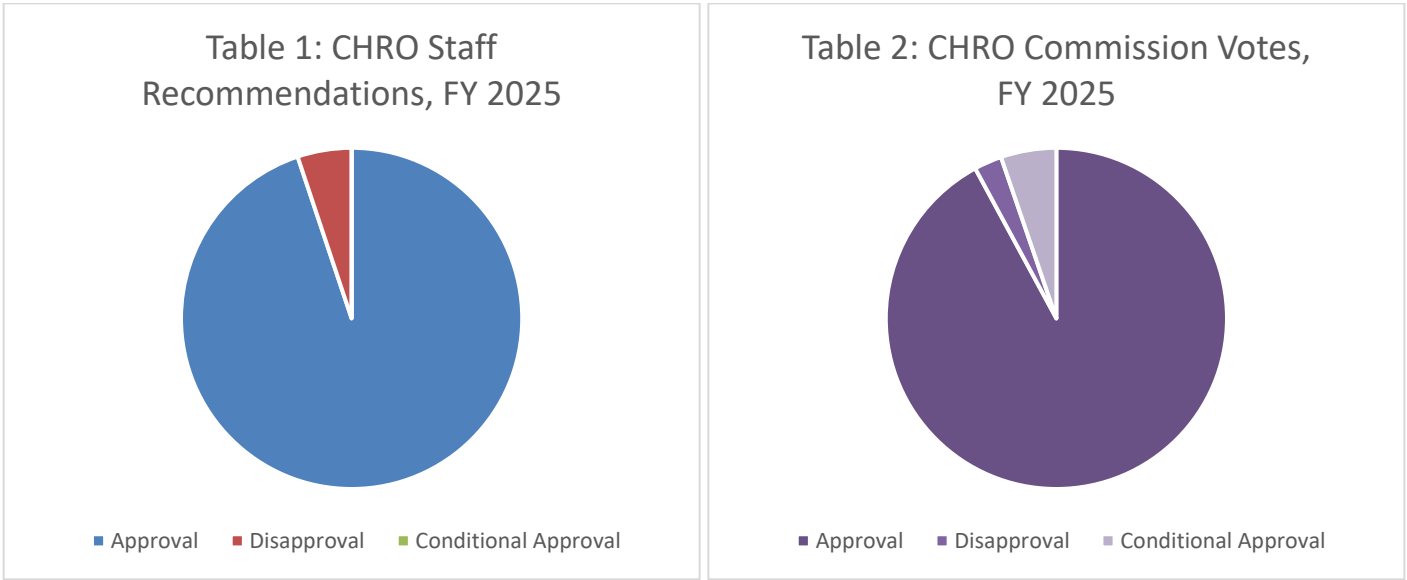
All agencies whose plans were reviewed during FY 2025 met their diversity training and education requirements. Agencies typically do not submit annual reports regarding their education efforts. Instead, this information is included in their Affirmative Action Plans submitted to the CHRO.

For a complete list of reporting state agencies and whether they met their diversity training and education requirements, see the Appendix of this report.

## **Statistical Analysis of State Agency Affirmative Action Plan Approval Ratings**

The data analyzed in this report comes from the thirty-nine state agencies that filed Affirmative Action Plans voted on by the CHRO during the last fiscal year. Each agency is required to file on either a semi-annual, annual, or biennial basis. As a result of the filing status, not every agency was required to submit an Affirmative Action Plan during the analyzed fiscal year. Out of the thirty-nine plans that were voted

on in FY 2025, CHRO Staff recommended that two of them be disapproved. These numbers are depicted in Table 1 below. The Commissioners voted to approve thirty-five plans, disapprove one, and conditionally approve two. For the conditional approvals, the Commissioners voted to change one disapproval recommendation to a conditional approval and one approval recommendation to a conditional approval. The overall results of Commission’s voting on each of the submitted Affirmative Action Plans are depicted in Table 2 below.



In addition to reviewing the substance of each plan, the Commission tracks the timeliness of agency filings. Of the thirty-nine plans reviewed in FY 2025, nine were submitted after their statutory deadlines. While the late submissions did not ultimately prevent these plans from receiving approval or conditional approval, untimely filings create delays in the review process and can impact agencies’ ability to address deficiencies before the next reporting cycle. The CHRO encourages agencies to adhere to their filing schedules and to communicate with the Affirmative Action Unit proactively when they anticipate difficulties meeting submission deadlines. Increased technical assistance and targeted outreach may help reduce the number of late filings in future reporting periods.

For full information regarding Affirmative Action Plans filed with the CHRO in FY 2025, see the Appendix.

**Conclusion**

The State of Connecticut, the CHRO, and the state agencies that have been consistently approved are committed to Affirmative Action Programming. The CHRO would like to see those state agencies that have not been consistently approved seek the technical assistance and training offered to them by the Commission. The CHRO is committed to uniformity in the development and implementation of plans across each reporting state agency. The Commission hopes to serve as a nationwide example for state-run Affirmative Action Programming.

## Appendix: Agency AA Plans Voted on in FY 2025

Agency	Filing Status	Timeliness Of Filing	Staff Recommendation	Commission Action	Diversity and Inclusion Requirements Met	Justification		
						(A)	(B 1-3)	(B4) Deficiencies Addressed
Central CT State University	Annual	Timely	Approval	Approval	Y	Y	3	NA
Charter Oak State College	Biennial	Timely	Approval	Approval	Y	Y	3	NA
Connecticut State Community College & University System	Annual	Timely	Approval	Approval	Y	Y	3	NA
Connecticut Technical Education & Career System	Annual	Timely	Approval	Approval	Y	Y	3	NA
CT State Community Colleges	Annual	Timely	Approval	Approval	Y	Y	3	NA
CT State Library	Biennial	Timely	Approval	Approval	Y	Y	3	NA
Dept. of Revenue Services	Annual	Timely	Approval	Approval	Y	Y	3	NA
Dept. of Administrative Services	Annual	Timely	Approval	Approval	Y	Y	3	NA
Dept. of Aging & Disability Services	Annual	Timely	Approval	Approval	Y	Y	3	NA
Dept. of Banking	Biennial	Timely	Approval	Approval	Y	Y	3	NA
Dept. of Children & Families	Annual	Untimely	Approval	Approval	Y	Y	3	NA
Dept. of Correction	Annual	Timely	Approval	Approval	Y	Y	3	NA
Dept. of Developmental Services	Annual	Timely	Approval	Approval	Y	Y	3	NA
Dept. of Economic & Community Development	Biennial	Timely	Approval	Approval	Y	Y	3	NA
Dept. of Education	Biennial	Timely	Approval	Approval	Y	Y	3	NA
Dept. of Emergency Services & Public Protection	Annual	Timely	Approval	Approval	Y	Y	2	NA
Dept. of Energy & Environmental Protection	Annual	Timely	Approval	Approval	Y	Y	3	NA
Dept. of Labor	Annual	Untimely	Disapproval	Conditional Approval	Y	N	3	NA

Dept. of Mental Health & Addiction Services	Annual	Timely	Approval	Approval	Y	Y	3	Y
Dept. of Motor Vehicles	Annual	Timely	Approval	Approval	Y	Y	3	Y
Dept. of Public Health	Annual	Untimely	Approval	Approval	Y	Y	3	NA
Dept. of Social Services	Annual	Timely	Approval	Approval	Y	Y	3	NA
Dept. of Transportation	Annual	Untimely	Approval	Approval	Y	Y	3	NA
Dept. of Veteran Affairs	Biennial	Timely	Approval	Approval	Y	Y	3	NA
Div. of Criminal Justice	Annual	Timely	Approval	Approval	Y	Y	3	NA
Eastern CT State University	Annual	Timely	Approval	Approval	Y	Y	3	NA
Elections Enforcement Commission	Annual	Untimely	Approval	Approval	Y	Y	3	NA
Insurance Dept.	Biennial	Timely	Approval	Approval	Y	Y	3	NA
Metropolitan District Commission	Annual	Timely	Approval	Approval	Y	Y	3	NA
Military Department	Biennial	Timely	Disapproval	Disapproval	Y	Y	3	NA
Office of Health Strategy	Annual	Untimely	Approval	Approval	Y	Y	3	NA
Office of the Attorney General	Annual	Untimely	Approval	Conditional Approval	Y	Y	3	NA
Office of the Secretary of the State	Biennial	Untimely	Approval	Approval	Y	Y	3	NA
Office of the State Comptroller	Annual	Timely	Approval	Approval	Y	Y	3	NA
Office of the State Treasurer	Annual	Timely	Approval	Approval	Y	Y	3	Y
Southern CT State University	Annual	Timely	Approval	Approval	Y	Y	3	NA
UConn Health	Annual	Timely	Approval	Approval	Y	Y	3	Y
University of Connecticut	Annual	Timely	Approval	Approval	Y	Y	3	NA
Western CT State University	Annual	Untimely	Approval	Approval	Y	Y	3	NA