



Streamlining Affirmative Action Plans
Recommendation Final Report
January 5, 2024 and revised on March
19, 2024

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Executive Summary

The State of Connecticut’s Commission on Human Rights and Opportunities (CHRO) aims to eliminate discrimination and provide equal employment opportunity and justice for all persons within the State of Connecticut. An aspect of ensuring equal employment is comprehensive affirmative action (AA) compliance reporting for Connecticut state agencies and college system. Equal Employment Opportunity (EEO) Officers document the activities taking place within an agency to demonstrate compliance with the State’s AA/EEO law. The current process to document agencies’ activities is a manual, paper-intensive process and many tasks such as data collection are repeated, but not standardized, across agencies.

Through extensive research, interviews and surveys, this report highlights the major pain points for submitters and evaluators along with recommended actionable solutions that will streamline the Affirmative Action Plan (Plan) process. Recommendations cover development of a new online application, changes to improve data quality and access, enhanced training and resources, and changes to the supporting regulation for the Plan process. Efficiencies gained by automation and streamlining will enable EEO Officers to dedicate more time to achieving goals and other critical activities such as training aimed at the elimination of discrimination.

The following is a summary of the agency Plan reporting to CHRO:

	Annual Submittals	Biennial Submittals
Agencies that file their own Plan	25	11
Agencies serviced by DAS Centralized EEO Division	5	9
Total Submittals	30	20

Problem Statement

Many EEO Officers and agency leadership report that the process of completing their Plan is extremely manual and generates a significant amount of work, with agencies having to develop unique approaches to gathering data and completing the required templates. The EEO Officers interviewed are passionate about the work and are interested in improving this process. We conducted a survey of EEO Officers, and the experience of creating Plans was described as the following:

- “It would be much more beneficial to spend that time conducting outreach/hosting events/working on other aspects of DEI [diversity, equity, and inclusion] and AA than writing a report with so many redundancies.”
- “It is time consuming to write and review Plans with so many sections interconnected...”
- “State Plans are a good tool to use to look backwards at what we have done, how we can improve - but I do think there are a lot of redundancies in the Plan.”

The challenges with the planning process have been described and acknowledged in other sources as well. The 2021 Connecticut CREATES report¹ identified ‘Streamline Affirmative Action Reporting’ as a key opportunity, based on similar agency reports:

¹ <https://portal.ct.gov/-/media/OPM/Secr-Reports/Connecticut-CREATES-Final-Report.pdf>

“Agencies consistently identified Affirmative Action reporting as a time-intensive and manual process and suggested that it could be more efficient with further automation and centralization. One agency noted that its annual plan produced thousands of physical sheets of paper and required year-round staffing. Another agency noted that the data for its reporting required significant additional manipulation to fulfill Connecticut statutes’ requirements.”

The CREATES report estimated that streamlining could lead to a 30 percent reduction in the reporting burden, freeing staff time would allow Connecticut to direct staff time for “other efforts to improve diversity and representation within State agencies, such as targeted recruiting of underrepresented minorities, providing career support to minorities already employed by the State, and increasing investment in other diversity, equity, and inclusion efforts.”

The Council on Women and Girls, initiated by Governor Lamont in 2019², in addition created a work group to focus on affirmative action plans, with:

“Goals to review and offer recommendations concerning methodology utilized to create affirmative action plans and to identify examples of success through the help of CHRO, and to look for process improvements to make affirmative action plans both more manageable/less burdensome for agencies and better aligned with the goal of diversifying our workforce.”³

The work group reported regularly to the Council, prior to 2023, on progress made updating data sources and other process improvements for the plans.

The Auditors of Public Accounts have also cited the affirmative action planning process as an area for improvement, with the 2022 audit including a finding that:

“The Commission on Human Rights and Opportunities does not have sufficient information technology resources to effectively support its three areas of service in discrimination case management, contractor compliance, and affirmative action reporting. CHRO should continue to pursue funding and obtain appropriate staffing resources to improve its information management capacity and agency efficiency. The commission should develop a strategy to upgrade its current information technology systems and training and implement electronic processing of state agency and contractor affirmative action plans.”⁴

This report is intended to support CHRO and agency efforts to address the challenges identified in the current process.

In the current landscape, each agency must individually come up with methods to collect, aggregate, and analyze data. Further, while agencies can approach CHRO individually for questions, there is not a central resource with guidance available to all agencies to assist EEO Officers in determining how best to comply with the regulation. Lack of resources may lead to Plans being modeled the same way year after year,

² <https://portal.ct.gov/Office-of-the-Governor/Working-Groups/Governors-Council-on-Women-and-Girls>

³ 2020 Annual Report from Council on Women and Girls: <https://portal.ct.gov/-/media/Office-of-the-Governor/Working-Groups/Council-on-Women-and-Girls/Annual-Report-Summaries/Annual-Summary-Report-2020-FINAL.pdf>

⁴ https://wp.cga.ct.gov/apa/wp-content/cgacustom/reports/FullReports/Human%20Rights%20and%20Opportunities,%20Commission%20on_FULL_20221221_FY2019,2020.pdf

without clarity on the components which are minimally required, or optional items that exceed the minimum requirements.

To the extent that an agency has not been able to develop processes to aid with the Plan preparation and analysis, it becomes labor-intensive and can have a negative impact on other critical EEO Officer tasks such as enhancing goal achievement, including but not limited to:

- Reviewing hiring packages
- Conducting outreach initiatives, including recruitment efforts through community and minority organizations and career fairs
- Conducting career counseling
- Investigating discrimination complaints
- Creating training activities

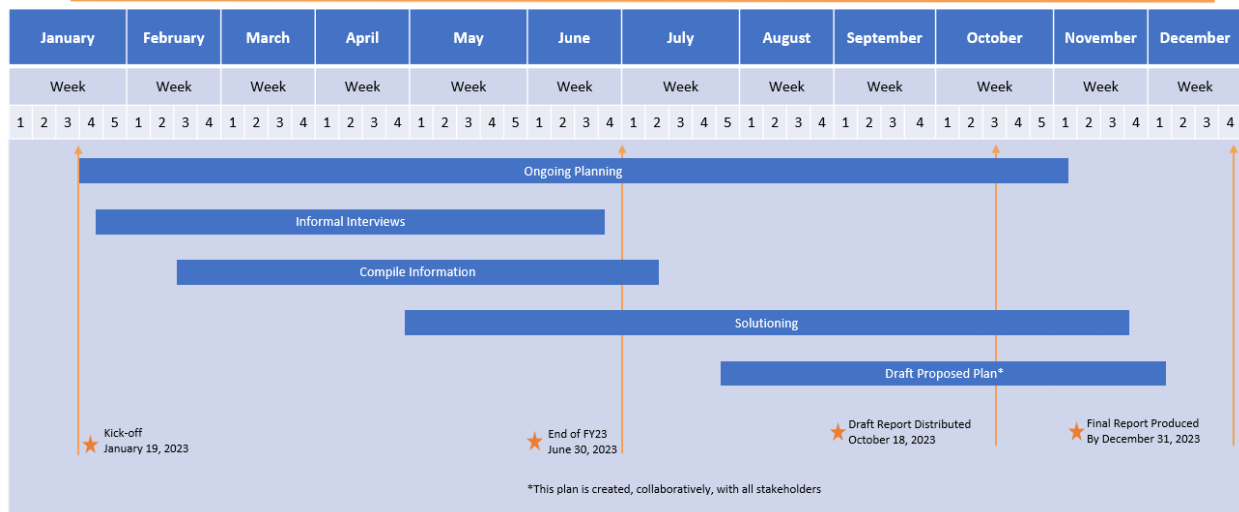
Our report seeks to provide recommendations to streamline the process used to prepare and submit Plans while maintaining the integrity of the program so that EEO Officers and CHRO reviewers can spend additional time across all functions of their roles.

CHRO worked with stakeholders prior to development of this report to prepare revisions to update the current 2015 regulation. We believe that the regulation should be reevaluated for changes needed to implement the proposed recommendations, including but not limited to enhancing the use of technology and implementing process improvements for developing, submitting and reviewing Plans, as recommended in this report.

Methodology

We began by identifying various stakeholders involved in the process of creating Plans and conducted informal interviews. Those stakeholders included: CHRO Plan Reviewers and Leadership, EEO Officers, Department of Administrative Services (DAS) Leadership, and Human Resources professionals. Since January 2023, OPM collected 35 responses to a survey to EEO Officers, conducted 17 individual and group meetings with EEO Officers, 16 meetings with DAS and 17 meetings with CHRO. This helped develop an understanding of the amount of effort and what is required to prepare, submit and review affirmative action Plans. To obtain a broad sample of EEO Officers' experiences, the Office of Policy and Management (OPM) developed a survey to gather additional feedback. We also investigated surrounding states' AA/EEO programs, including participating in a demonstration of the Massachusetts Affirmative Action Plan System. After drafting an initial list of ideas, we began to evaluate ideas with our stakeholders, to determine what areas needed further investigation, and to ascertain feasibility.

Timeline



Evaluation Criteria

This report focuses on ideas that perform well on the following criteria:

- Level of Impact: Ideas that address the real concerns raised by EEO Officers and CHRO and documented in the survey and interviews
- Actionable: Ideas that appear to be implementable through one of the key stakeholders involved in review of the Plan process
- Stakeholder Support: Ideas that had a high-level of support by the same stakeholders

In other words, the report prioritizes recommendations that are directly actionable to provide momentum for the changes to the process of preparing, submitting and reviewing CHRO Plans. OPM recognizes that implementation may require resources. At the same time, implementation of these recommendations should create a more efficient process for developing, submitting, and reviewing Plans. Public Act 22-118⁵ appropriated \$200,000 to automate portions of the affirmative action process and these funds were carried forward to FY 2024. The \$200,000 is fully available to implement some of the recommendations contained in the report, as OPM separately funded the planning process for this report. OPM remains committed to collaborating with CHRO, DAS and other agencies to successfully implement the recommendations in the report.

Recommendations

1. Implement an Online Application Platform

Through the process of stakeholder engagement, CHRO and many EEO Officers indicated support for developing an online application platform that would make it easier for EEO Officers and CHRO to fulfill their respective roles in Plan administration. An online platform is included in CHRO's IT Strategic Plan⁶

⁵ Public Act No. 22-118: <https://www.cga.ct.gov/2022/ACT/PA/PDF/2022PA-00118-R00HB-05506-PA.PDF>

⁶ CHRO IT Strategic Plan: <https://portal.ct.gov/-/media/CHRO/Reports/2024-CHRO-IT-Strategic-Plan.pdf>

and would also enable focusing on the parts of the regulation that require action and the actions needed to satisfy regulatory requirements. An online platform would be tailored to meet the State's rigorous statutory and regulatory policies, would eliminate paper submissions, would reduce inconsistencies across agencies, and be developed with an eye towards bringing as much data into the system to facilitate completion of the Plan as possible.

An online application should be developed that would accomplish the following:

- a. Simplify how information is incorporated into the Plan.
- b. House data sets or link to data sources that are used for each Plan (e.g., census data).
- c. Perform calculations that agencies need to complete the Plan.
- d. For each component of the Plan regulation, build functionality that will specify the documentation required, which will facilitate and expedite the collection of the different types of supporting documents required for compliance. This level of specificity would also serve as an aid for an EEO Officer to easily determine how compliance can be satisfied and enable movement away from time-consuming free-flowing narrative to more structured responses.

Further, this platform would enable the EEO Officers to easily provide the documentation needed and for the CHRO reviewer to find the elements which demonstrate compliance. See Appendix 4 for a table for the latest analysis of the current regulation, which identifies those sections that require action in the Plan, and the proposed supporting document to satisfy the requirement. Examples of documentation types that could be used for Plan compliance include but are not limited to:

- Narrative, either a complete write up and/or explanation for an observation in a report. Spaces for narrative would be designed to capture the approximate length of the narrative that is expected.
- Attestation (yes/no), with an opportunity to provide an explanation if the response is counter to the expected result. For attestation, the agency would confirm that the agency meets the requirement for the Plan, including signature by the agency head. CHRO plan reviewers could still consult with the agency or seek confirmation to ensure that the requirement is met.
- Drop downs that include structured anticipated responses: This removes the need for the EEO to develop messaging and sets the expectation for what is needed.
- Fields to accept file uploads and or links to share a required report, or other supporting documentation such as an organization chart or in other cases, the agency could provide links to existing agency policies or procedures, as attachments or separate documents.
- Space for agencies to include optional and additional materials, which go beyond regulatory requirements.

Sample requirements for development of an online platform, in the form of user stories, can be viewed in Appendix 3. The requirements center on the feedback from various users and their specific needs for the system to fulfill the duties to comply with the regulation.

Example requirements include but are not limited to:

- Highlighting more easily the Plan elements and responses that have changed since the last submission with CHRO being able to follow up with the agency if there is additional information needed to ensure compliance with the regulation.

- Built in audit rules and cross-checking to assist with accuracy and completeness.
- Help to facilitate compliance with records retention requirements using electronic storage mechanisms.

2. Develop CHRO Approved Templates for Plan Development

We recommend an Excel workbook with built-in formulas be developed and approved by CHRO and placed on the CHRO website as a resource for EEO Officers to use when completing their plan, along with guidance on how to utilize the tool. An Excel workbook should enable EEO Officers to input data (some derived from State Analytical Reporting System (STARS) queries noted in Recommendation 3), perform calculations and present the results in the specified CHRO format. The results can easily be converted to pdf and included in the Plan. By creating this workbook, it standardizes a function that takes place across agencies and reduces human error including rounding issues between schedules. Further, the templates will be a helpful tool for new EEO Officers.

In our survey and discussions with EEO Officers, respondents recommended linked templates as it would provide EEO Officers with the ability to spend more time on the analysis of data and other activities required for compliance making the work less cumbersome.

It is important to note that the goal is to eliminate the need for a separate workbook once an online application is implemented, however, the workbook will be an interim measure and if needed, could be used over a longer term. OPM is continuing to work with EEO Officers that have already developed a workbook with the goal of developing a common workbook by 4/1/2024 that could be used across all agencies and then submitted to CHRO for approval. It is envisioned that the workbook would require minimal future modification and would require no specialized training beyond a working knowledge of Excel to maintain.

3. Develop STARS Queries to Extract Plan Data

We recommend that the State Analytical Reporting System (STARS) queries continue to be developed to facilitate data collection needed to complete the Plans in the short-term, as well potentially feeding an application once implemented. After speaking with EEO Officers we learned that agencies are compiling, organizing and categorizing employee data needed for their Plan using unique approaches.

From surveying EEO Officers, we learned that Core-CT is utilized more to complete various sections of their plan compared to STARS.

Sections Where Respondents Utilize STARS¹²



Sections where respondents utilize CORE-CT¹⁸



By using STARS, EEO Officers have a systematic way to gather the data formatted in accordance with the forms prescribed by CHRO on the employees within their agencies.

Developing systematic queries would require eliminating any manual adjustment outside of the system. Anecdotally, EEO Officers report using adjustments to Core-CT data for the Plan process, including but not limited to classifying employees in different EEO Classifications than what correlates to an employee's job title as prescribed by DAS.

The Core-CT team processes transfer requests and has confirmed there are known timing challenges in capturing employee transfers and separations across agencies, which cause the data from Core-CT, which feeds STARS, to be delayed. However, any new hires or promotions within an agency can be completed on time. To the extent that the agency decides to wait for the data to catch up, it creates challenges in meeting the timelines, which are further discussed in subsequent recommendations.

All the reports necessary have been completed in STARS to date, with access for state HR staff:

- Workforce Analysis Report
 - Full Time/Part Time Employees Summary
 - Full Time/Part Time Employees Summary Percentage
 - Full Time/Part Time Employees Summary by Age Group
 - Full Time/Part Time Summary by Disability
- Employment Process Analysis Report
 - Full Time Employees Summary by Year-- Workforce Number Current Filing/Workforce Number Prior Filing
 - Hires/Rehires/Terminations/Promotions Transaction Details
- Workforce by Job Title Report
 - Full Time/Part Time Employees Details by Job Title
- Workforce By Employee Report
 - Full Time/Part Time Employees Details

The challenge to automation, as noted elsewhere in the report, is that manual adjustments that are made to the Plan need to be minimized for efficiency. A cohort of EEO Officers with access to STARS reporting

functions tested the above reports to ensure the ability to use in the Plan process and further consultation with EEO Officers will be needed to finalize the report format and data.

4. Improve Core-CT Data Quality

Through interviews, EEO Officers reported a lack of confidence in data from Core-CT, the system of record for employee records, stating incomplete or inaccurate data. Specific issues include the timing issues identified above, the transfer of applicant selected demographic information from JobAps to Core-CT as described in recommendation #8, as well as missing or incomplete demographic data required by the Plan regulation.

Improving the completeness of the data in Core-CT by periodically prompting employees to voluntarily review and update their information in Core-CT would address this challenge. Employees should receive a periodic prompt, with an explanation for the purpose and use of this data in the affirmative action planning process. We recommend that the following options be considered to ensure state employees understand how their data are used in the affirmative action planning process:

- Request Core-CT to periodically prompt users to voluntarily update data when logging in.
- Request agencies' Human Resources staff to periodically remind employees to provide updated demographic data on a voluntary basis.

Any prompt, whether from Core-CT or Human Resources, should clearly identify how the data will be used to support the goals of the affirmative action planning process and the rights of users to individual privacy and self-identification. We recommend that DAS and CHRO work closely to draft model prompt language, scope and frequency for any prompts, including consulting relevant research on question wording and prompts to ensure the requested updates do not discourage or stigmatize respondents.⁷

As of January 5, 2024, data from executive branch agencies show that roughly 2 percent of employees (659 out of 30,254) did not report their race/ethnicity ('not disclosed') and 0.1 percent (36 out of 30,254) did not report their gender ('unknown'). The unreported information could be for a variety of reasons.

5. Enhance Training and Resources Available for EEO Officers

The CHRO is statutorily responsible for providing training and technical assistance to State agencies under Sec. 46a-68-106 of the Connecticut General Statutes. Those surveyed and interviewed expressed a desire for more structure around how this responsibility is fulfilled by the CHRO and to have additional training and best practices to aid in their compliance efforts to have a better understanding of the level of support required to comply with regulation. Recommendations include:

- A. Develop a dedicated Resource Page on the CHRO website, which should include:
 - Links to the regulation, with additional guidance on policies and procedures;
 - Link to State's Current Nondiscrimination Statutes;
 - Links to training materials / resources;
 - Frequently asked questions;

⁷ Ruben D. Vega Perez et al., Improving Patient Race and Ethnicity Data Capture to Address Health Disparities: A Case Study From a Large Urban Health System, 14 *Cureus* (2022), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8815799/>.

- CHRO issued communications (e.g., Affirmative Action Labor Market Update Memorandum);
- Fillable CHRO forms and approved templates;
- Job aids to applicable systems (e.g., STARS Queries); and
- Yearly Plan Filling Schedules for Agencies

B. Develop a CHRO-led Training Program for EEO Officers:

Providing training opportunities throughout the year would drive greater consistency of practice across State agencies and ultimately improve compliance. Examples of training topics include, but are not limited to:

- Understanding the mission and purpose of agency EEO Officers;
- Annual refresher training on how to complete the Plan;
- Updates or training when changes to regulations, policies and procedures occur;
- The appropriate resources and tools to use;
- Sharing of best practices for a strong EEO program, such as for leadership buy-in; and
- Collaborating with agency leadership and HR professionals on creating efficient processes, such as how best to support their assigned agencies in the filling of positions as efficiently as possible.

During the process of speaking to EEO Officers and after reviewing survey results, we learned that there are varying levels of access to resources across agencies to do this work. Agencies that have been able to develop training programs or other materials, could share these resources as a jumping off point for challenges and opportunities in this important work. To support the dissemination of these resources and training, we recommend creating a community of practice where EEO professionals can collaborate. A community of practice is “...[a] group of people who share a concern or passion for something they do and learn how to do it better as they interact regularly.”⁸ Creating a community of practice would strengthen capacity and help share resources to better serve the residents of Connecticut.

6. Provide Improved Access to Standard Census Data

We recommend developing a set of guidance and tools to improve access to the Census data that underlies many components of Plans.

Developing Plans relies on Census data for the availability analysis, which feeds into the goals analysis and other Plan components. Many EEO Officers have developed custom spreadsheets or tools for Census data but there would be value for EEO Officers and CHRO Plan reviewers if there were easier access to Census data and consistent formats for reporting Census data.

Census EEO tabulations are the standard data source for Plans and are published approximately every ten years with non-overlapping American Community Survey (ACS) data years using the five-year samples that allow local analysis. The most recent EEO tabulations are for the 2014 – 2018 sample, which uses data

⁸ <https://www.wenger-trayner.com/introduction-to-communities-of-practice/>

collected over the 60-month period of January 1, 2014, through December 31, 2018. The following occupational groups are included in the tabulations⁹:

- Census detailed occupations (236/237 occupations)
- EEO Occupational Groups (14/15 categories)
- EEO-1 Job Categories (9/10 categories)
- Federal Sector Job Groups (9 categories)
- State and Local Government Jobs (8/9 categories)

For the availability analysis, EEO Officers must manually map DAS job classifications to the occupational groups based on identification of similar job and skill requirements.

To support improved access to Census data, the Connecticut Data Collaborative (CT Data) will put in place two tools by June 30, 2024. CT Data is the designated Census State Data Center¹⁰ and as part of that role provide access to Census data for local stakeholders.

For this recommendation:

- CT Data will develop webpages to help EEO Officers access and navigate Census data.
- CHRO will also provide guidance for CHRO and EEO Officers on accessing Census data, as part of the online materials discussed in recommendation #5 in this document.
- CT Data will develop standard tables that can be accessed in Excel or an online dashboard with counts and percentages for the Equal Employment Opportunity Commission (EEOC) codes and key occupations for the state and planning regions. Tables would include the demographic and workforce categories required by the Plan regulation.

Massachusetts provides similar tables for EEO Officers as an input to the plan development process – a sample is below. The required demographic categories differ for Connecticut, but the source data (ACS 2014-2018) and workforce categories are the same.

Sample Census table from Massachusetts Office of Diversity and Equal Opportunity (ODEO):

⁹ Presentation by Industry and Occupation Statistics Branch (IOSB), Social, Economic, and Housing Statistics Division (SEHSD), U.S. Census Bureau, May 24, 2002 to CHRO and EEOs.

¹⁰ <https://www.census.gov/about/partners/sdc.html>

HAMPDEN COUNTY, MA									
WORKFORCE AVAILABILITY STATISTICS									
	Total Civilian Labor Force	Officials and Administrators	Professionals	Technicians	Protective Service: Sworn	Protective Service: Non-Sworn	Administrative Support	Skilled Craft	Service Maintenance
Hispanic	19.6%	8.2%	10.7%	25.6%	15.5%	16.7%	18.4%	13.7%	29.7%
White	68.7%	83.8%	77.8%	61.9%	70.6%	59.8%	70.8%	79.5%	55.9%
Black	7.7%	4.5%	7.1%	7.7%	12.7%	14.4%	6.4%	4.4%	10.7%
Native American	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.2%	0.2%	0.1%
Asian	2.2%	1.9%	2.8%	2.8%	0.1%	0.0%	2.3%	1.2%	2.0%
Nat Hawaiian/PI	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Two or More Races	1.7%	1.6%	1.6%	1.9%	1.3%	9.2%	2.0%	1.1%	1.6%
All Minorities	31.3%	16.2%	22.2%	38.1%	29.4%	40.2%	29.2%	20.5%	44.1%
Females	49.2%	44.6%	60.3%	43.0%	13.7%	54.0%	63.2%	8.1%	47.1%
The 2020 ACS US Census Employment by State and Local Occupation Groups data was collected from 2014-2018.									
"Two or More Races" reports data identified by the ACS as "Balance Not Hispanic." It includes people not reporting individually as either Hispanic, White, Black, Native American, Asian, Native Hawaiian/Pacific Islander, or Two or More (non-Hispanic) Races.									

With these changes, EEO Officers can still directly access and analyze Census data or other sources, but standard tables will ease reporting for availability and goals analysis for EEO Officers and provide consistency in the use of data in plans to simplify the review process for CHRO.

7. Ensure EEO Officers have access to Applicant Data for Goals Analysis

The survey of EEO Officers identified the Goals Analysis as the primary pain point in plan development.

Ranking & Response: Error Prone Sections

Top 5 sections that are most prone to error⁸

1. Goal Analysis
2. Availability Analysis
3. Utilization Analysis and Hiring and Promotion Goals
4. Employment Analyses
5. Workforce Analysis

Main causes for errors in the sections⁹

- "A lot of research goes into Goals Analysis and the narrative must cover all hires/promotions, with meticulous accounting regarding unsuccessful goal candidate."
- "Human error - there is a lot of data that needs to be manipulated and sorted before it can even be reported on."
- "If some of the formulas are not working or totals on one sheet do not match the totals on the subtotals sheet, an [error] could occur."

⁸ References Survey Question: Rank the top 5 element(s) of the plan that are most prone to error.

⁹ References Survey Question: What are the main causes for errors in the sections selected above?

For the goals analysis, EEO Officers are required to report as follows¹¹:

¹¹ https://eregulations.ct.gov/eRegsPortal/Browse/RCSA/Title_46aSubtitle_46a-68Section_46a-68-90/

(b) For each job search, the agency shall provide the race and gender of:

(1) the total applicant pool;

(2) the qualified applicant pool; and

(3) the applicants interviewed.

(c) When a goal is met, the agency shall identify the applicant as a goal candidate. No other information is required.

(d) Each unmet goal shall be accompanied by a narrative outlining the agency's good faith efforts to achieve that goal by explaining why each goal candidate was eliminated. Each unmet goal, by job search, shall be separately addressed by narrative and the discussion of each goal applicant shall be detailed and complete.

Since applicant data is not captured in the Core-CT system, it cannot be systematically reported through STARS or Core-CT reports. EEO Officers must manually track data on the applicant pool for job searches, as well as the rationale and narrative for unmet goals and do not have access to the systems of record. JobAps is the online platform where applicants apply for employment with the state. The JobAps system captures some applicant data, but JobAps access is reserved for human resources staff, which does not include all EEO Officers.

Data for applicants is tracked outside JobAps by some agencies that report through DAS in the Applicant Tracking Data Chart (ATDC), an Excel spreadsheet with macros that permits some reporting for Plan development. The ATDC collects data on the applicant pool, the narrative for unmet goals, and related attachments and signatures. However, access to the ATDC is reserved for use of DAS client agencies and the spreadsheet itself does not meet standard accessibility or interoperability requirements that would allow use in an application platform.

To improve plan administration, we recommend three changes related to access to applicant data:

- For access to JobAps data, create a set of standard reports that can be generated from JobAps for use by EEO Officers. Development of canned reports ensures a consistent format, without requiring development or changes to the JobAps platform directly. However, it still relies on some intermediary providing EEO Officers access to the reports. For example, many EEO Officers must rely on their Human Resources Business Partner to forward reports that are needed from JobAps.
- DAS should explore options to create or modify JobAps roles in addition so that EEO Officers can directly access information that is needed to do meet Plan requirements. Creation of an EEO role in JobAps would need to take into account privacy and security considerations so that EEO Officers could only access the minimal information needed for reporting and Plan development.
- To improve plan administration, we recommend that EEO Officers regularly collaborate with their agency leadership and partnering HR professional to optimize the methodology and rhythm for sharing data necessary to meet plan requirements. Additionally, CHRO and DAS should consider automating a tool like the ATDC (and other similarly purposed forms) for standardization across agencies and to further streamline this compliance activity in relation to the vacancy filling process. Automation of the core functionality in the ATDC (applicant tracking, collecting signatures and related documentation) in an online application will ensure that the primary pain point in the

Plan development process is part of the scope of the new tool and will be accessible to all EEO Officers.

8. Ensure Consistent Demographic Categories Across Connecticut Data Systems

Plan development relies on data from three primary sources:

- Core-CT for employee demographics
- JobAps for applicant demographics
- Census EEO tabulations for availability analyses

The regulation requires reporting from these systems by specific demographic categories, and this specificity is identified consistently as a strength of the Plan administration process. Under regulation, Sec. 46a-68-75. (“Definitions”), the following categories must be used for Plan development:

(28) "Race and sex" or "race and sex group" means the following groups of persons: white males, black males, Hispanic males, other males, white females, black females, Hispanic females and other females.¹²

CHRO then requires Plan reporting be based on the regulation, with recent addition of an “AAIANHIA” category to capture Asian American, American Indian, Alaska Native and Hawaiian Islanders. Unfortunately, the three primary sources used for Plan development report “race and sex” categories differently than what is required in the regulation. Consequently, agency EEO Officers must make individual judgment calls about reporting key demographic categories which leads to inconsistency for Plan administration and review across agencies. The tables below display the categories as captured in the two systems of record and Census table for race/ethnicity and sex/gender:

Race/Ethnicity		
JobAps	Core-CT	Census
American Indian or Other Pacific Islander	American Indian (AMIND)	American Indian/Alaska Native alone
	Pacific Islander (PACIF)	Native Hawaiian/Pacific Islander alone
Asian	Asian	Asian alone
Black/African American (Non Hispanic)	Black/African American (BLACK)	Black of African American alone
Hispanic or Latino	Hispanic or Latino (HISPA)	Hispanic or Latino
White, Non-Hispanic	White	White alone
Two or more races	Two or more races (TWO)	Balance of not Hispanic or Latino
Decline to State	Not Specified (NSPEC)	
	(Blank)	
Not Hispanic or Latino		

Sex/Gender		
JobAps	Core-CT	Census
Male	Male (M)	Male
Female	Female (F)	Female
Non-binary		
Decline to State	Unknown (U)	
	(Blank)	

¹² https://eregulations.ct.gov/eRegsPortal/Browse/RCSA/Title_46aSubtitle_46a-68Section_46a-68-75/

As of November 21, 2023 JobAps includes the selection of non-binary as an option for applicants.

Federal reporting for race / ethnicity and sex and gender are anticipated to change in the near future based on separate proposals from the Biden administration.¹³ Plan administration at the local level and the systems of record will need to adapt to these changes.

We recommend two related changes to increase consistency in the Plan regulation and state-administered systems to facilitate Plan development by EEO Officers and review by CHRO:

a. Update Regulation to Allow for Flexible Demographic Groups

In addition, we recommend modifying the language to align the “race and sex groups” with state-administered systems and federal guidelines, rather than “hard-coding” or specifying predetermined groups in the regulation. The current approach lists specific groups, which means the regulation must be revised for any change in state or federal standards. A standards-based approach allows more flexibility as standards for collecting race and ethnicity continuously change.

b. Launch working group to align categories in state-administered systems

We recommend a working group, led by DAS, and including CHRO and other experts in the field of EEO work, be convened to evaluate the possibility of having consistent demographic categories in the two primary state-administered systems, Core-CT and JobAps. Employee records in both systems are managed through DAS, which has the ability to make changes in reporting for both. Currently, the categories are not aligned for Asian, American Indian/Alaska Native, Native Hawaiian/Pacific Islander and for non-response options. Individuals that do not identify with the existing categories are not captured consistently across systems and either select “Not specified,” leaving categories blank or explicitly “Decline to state.” In addition, the alignment of categories will further improve confidence in the data contained in Core-CT. As a best practice, systems should support self-identification and include explicit options for employees to decline to provide their demographic information, across the State’s data systems.

The working group could then remain active as the federal changes to race / ethnicity and sex / gender reporting are implemented. Changes are likely to include addition of Middle East / North African as a race and unified reporting of race and ethnicity as one category, rather than two.

9. Review Reporting and Correction Timelines After Automation

Completing and filing plans in a timely fashion is a challenge for both EEO Officers and CHRO Plan reviewers, as agencies often submit late corrections to significant portions of the Plan due to the challenges of completing an accurate Plan on time. However, the process changes described in recommendations 1 – 8 are intended to streamline the process to allow EEO Officers and CHRO Plan reviewers to complete Plan submission and review more efficiently. We recommend CHRO consider the following recommendations associated with schedules and timelines once the automation described in recommendations 1 – 8 has been completed.

¹³ <https://spd15revision.gov/content/spd15revision/en.html>, <https://www.whitehouse.gov/briefing-room/presidential-actions/2022/06/15/executive-order-on-advancing-equality-for-lesbian-gay-bisexual-transgender-queer-and-intersex-individuals/>

Based on the potential improvements for the process, we recommend CHRO review two changes in combination to streamline the process:

- To streamline the review process for CHRO by enforcing the window for revisions by agencies after Plan submission and;
- To facilitate the Plan development and submission process for agencies by moving to a biennial schedule for most agencies, allowing a longer time for Plan development

a. Window for Corrections to Plans

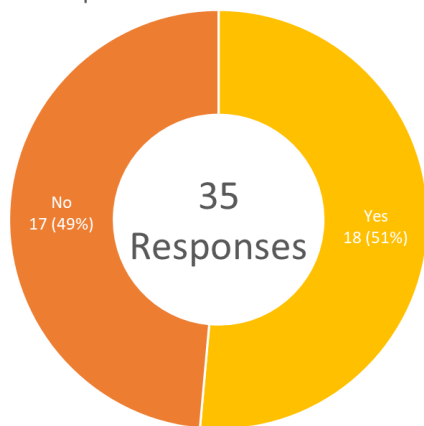
We recommend CHRO review the thirty-day window of correction that agencies have to make corrections, as provided in the regulation¹⁴:

(a) All agencies shall file an affirmative action plan with reporting periods and filing dates established by the executive director of the Commission on Human Rights and Opportunities pursuant to section 46a-68(g) of the Connecticut General Statutes.

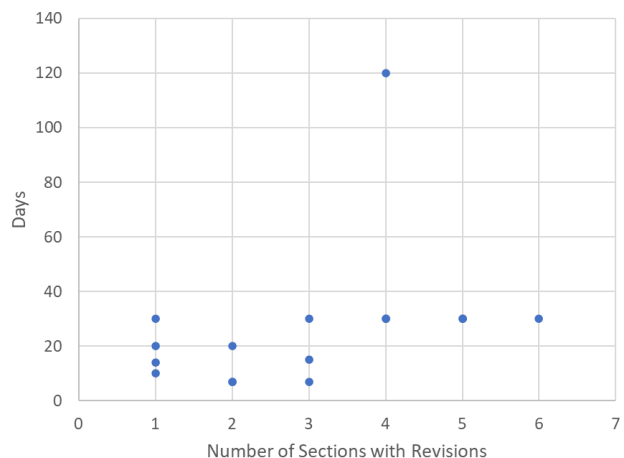
(b) Agencies shall have thirty (30) days after its affirmative action plan filing schedule to make corrections to such plan.

The survey of EEO Officers indicates that roughly half of agencies have submitted a revision using this 30-day window, with revisions often covering multiple sections of the Plan (up to six).

Have Respondents Submitted a Revision?¹⁶



Number of Days Since Initial Plan Submission^{17*}



¹⁶ References Survey Question: Have you submitted a revision to your agency's affirmative action plan after it has been submitted?

¹⁷ References Survey Question: If yes, how many sections included revisions? & If yes, how long after the initial submission was the revision submitted? Provide number of days.

* Two 'Yes' responses were excluded due to invalid responses.

According to CHRO, agencies use the correction window to submit wholesale Plan changes versus what would typically be understood as minor or factual corrections. Consequently, use of the 30-day window for corrections makes the review process for CHRO slower and more challenging as substantive changes to Plans can arrive after the required filing date. At the same time, agencies make use of this window as compiling the Plan is a difficult and time-consuming process, often taking months of staff time.

¹⁴ https://eregulations.ct.gov/eRegsPortal/Browse/RCSA/Title_46aSubtitle_46a-68Section_46a-68-97/

We recommend that CHRO review this timeline by requesting or compiling additional information from EEO Officers to understand specifically what is causing agencies to use the correction period to complete the plan and what measures can address those issues. (For example, timing issues related to the Core-CT data could cause agencies to submit late corrections to Plans.) The review should cover defining a) what constitutes a correction (ex. factual vs. substantive change) and b) what steps are required for agencies to submit a correction (ex. is agency leadership signoff required?). It is recommended that any subsequent change in how this regulation is implemented have ample notice provided to agencies to adhere to the new guidance.

b. Biennial Reporting

In concert with the above recommendation, we recommend that CHRO also review the reporting schedule for agencies, and the potential for statutory and regulatory changes to modify the agency filing schedules, which are currently based on agency size. We recommend CHRO review the Plan preparation and reporting process to identify any potential changes to reporting for agencies. This would enable agencies to invest additional time in activities aimed at improving goal achievement versus Plan submittal.

Changing the reporting schedule to sustain goals for a longer period of time will enable agencies to chart their progress against those goals so that goals are not a moving target. Meeting the timelines is difficult for agencies, especially given the lags in Core-CT data. One EEO Officer explains: "Core-CT is 4 weeks behind in entering new and promoted employees. Therefore, to do "accurate" analysis of the Plan year, one has to wait one month before assessing the information." Moving the Plans to cover longer time periods could facilitate extending the timelines for agencies to complete the Plan and for CHRO to also have additional time to complete their review.

Further, CHRO should review adjustments to the frequency of Plan submittal, such as adjusting the agency filing schedule so that Plans are staggered resulting in fewer Plans requiring a full review each year. We recommend additional review and conversation between CHRO and agencies occur to understand the pros and cons of changing filing schedules and timelines once the automation described in recommendations 1 – 8 has been completed.

10. Reduce Agency Burden by Increasing Threshold for Availability Analysis

CHRO has recommended revisions to the regulation (under Sec. 46a-68-84 Availability Analysis) that agencies could seek approval to waive the requirement of completing the separate availability analysis by position when an agency has twenty-five (25) or more employees in that position. CHRO could consider expanding this proposed regulatory change to include specific scenarios that would not require CHRO approval and could be implemented on a permanent basis, if an agency was in good standing. At a minimum there should be additional guidance as to how the proposed regulatory change would be implemented (e.g., would agencies have to ask for every position group? What criteria would be applied?).

We further recommend that CHRO consider increasing the threshold for the requirement to provide additional reporting when an agency has 100 or more employees in that position. Increasing the threshold would still enable the detection of potential discrimination as, under Sec. Sec. 46a-68-84, CHRO maintains "the right to determine the appropriateness of information and data used in [this section] and reserves

the right to accept or reject such information or data.” Additional analysis can also be performed by agencies “for any job title requiring unique skills, abilities or educational qualification.”¹⁵

CHRO and Agencies should be provided with the flexibility to use a lower threshold to conduct an analysis if needed to properly evaluate positions in their agency. As the table below indicates, at current levels, agencies must complete roughly 300 separate availability analyses, creating a reporting and review burden. Increasing the threshold to 100 employees would reduce the number of analyses to just over 60, which still covers the major occupations that employ a large number of individuals.

Comparison of Number of Separate Availability Analyses Produced Across Agencies Depending on the Threshold of Employees in a Position Classification (As of October 30, 2023)

	Employee Threshold for Additional Position Classification Reports						
	Current	Proposed Threshold					
Threshold	25+	30+	35+	40+	45+	50+	100+
Amount of Separate Reports Produced Depending on Proposed Threshold	298	247	218	190	163	146	64

Conclusion

We believe that implementing the combination of the recommendations will address many of the challenges documented throughout this process. Those recommendations are:

1. Implementing an Online Platform
2. Developing CHRO Approved Templates
3. Developing STARS Queries to Extract Data
4. Improving Core-CT Data Quality
5. Enhancing Training and Resources Available for EEO Officers
6. Providing Improved Access to Standard Census Data
7. Ensure EEO Officers have access to Applicant Data for Goals Analysis
8. Ensure Consistent Demographic Categories Across Connecticut Data Systems
9. Review Reporting and Correction Timeline After Automation
10. Reduce Agency Burden by Increasing Threshold for Availability Analysis

The recommendations will require action by multiple stakeholders, including CHRO, DAS, EEO Officers, OPM, and others. Some recommendations require statutory or regulatory changes, and as noted earlier, we recommend pursuing the regulatory changes already developed by CHRO and EEO Officers, with the addition of items identified in the report recommendations above.

Appendices and Attachments

- Appendix 1: Survey Results Presentation
- Appendix 2: Implementation Roadmap
- Appendix 3: Sample User Stories

¹⁵ https://eregulations.ct.gov/eRegsPortal/Browse/RCSA/Title_46aSubtitle_46a-68Section_46a-68-84/

- Appendix 4: Evidence Requirement for Plan Regulation
- Appendix 5: CHRO's Responses and Comments on the Streamlining Affirmative Action Plans Recommendation Revised Final Report

AA Plan Survey Results

Presented by Augusta Irechukwu

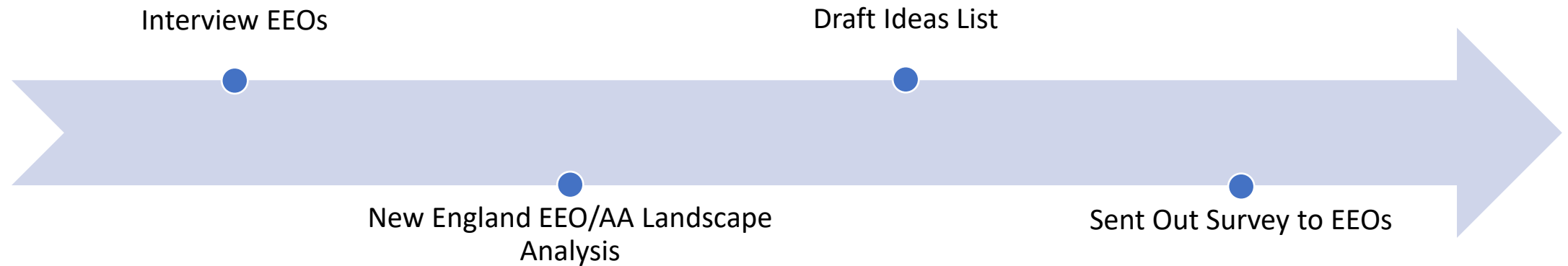
Tuesday, June 6, 2023



Overview

1. Project Progression
2. Survey Results
 1. Themes
 2. Survey Statistics
 3. EEO Voices
 4. Ranking & Response
 5. Tools
3. Conclusion

Streamlining AA Plans Project Progression in 2023





Survey Results

Themes

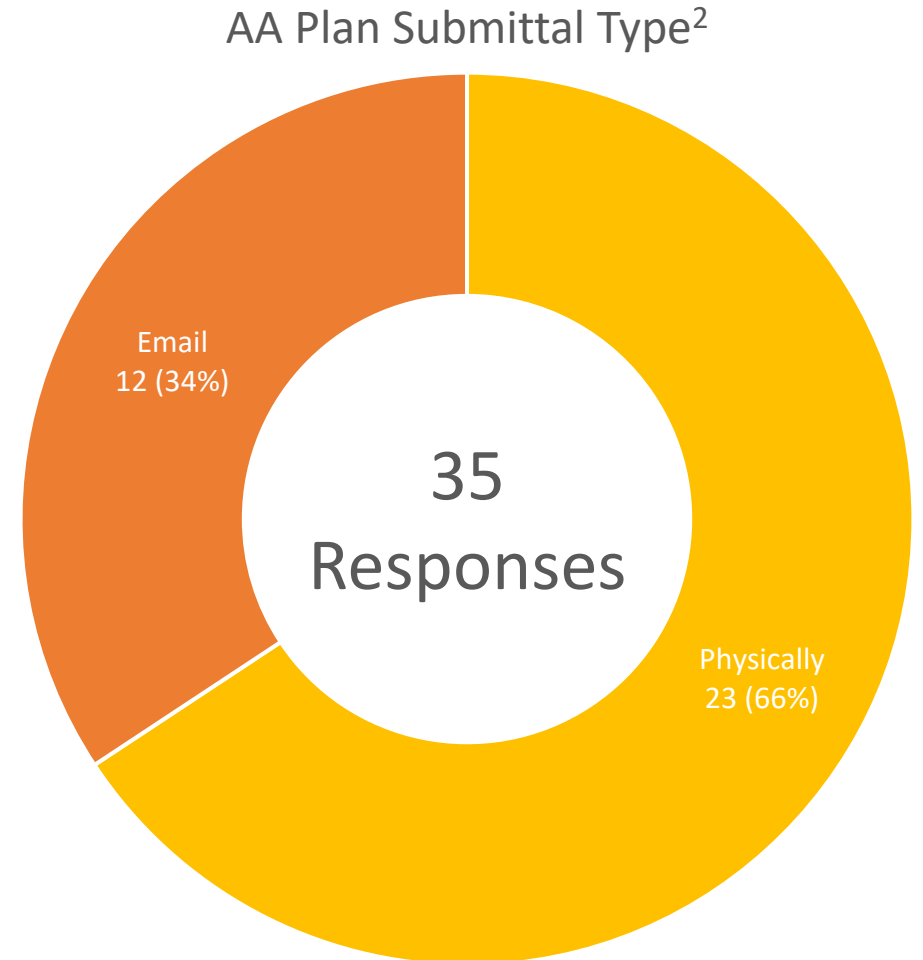
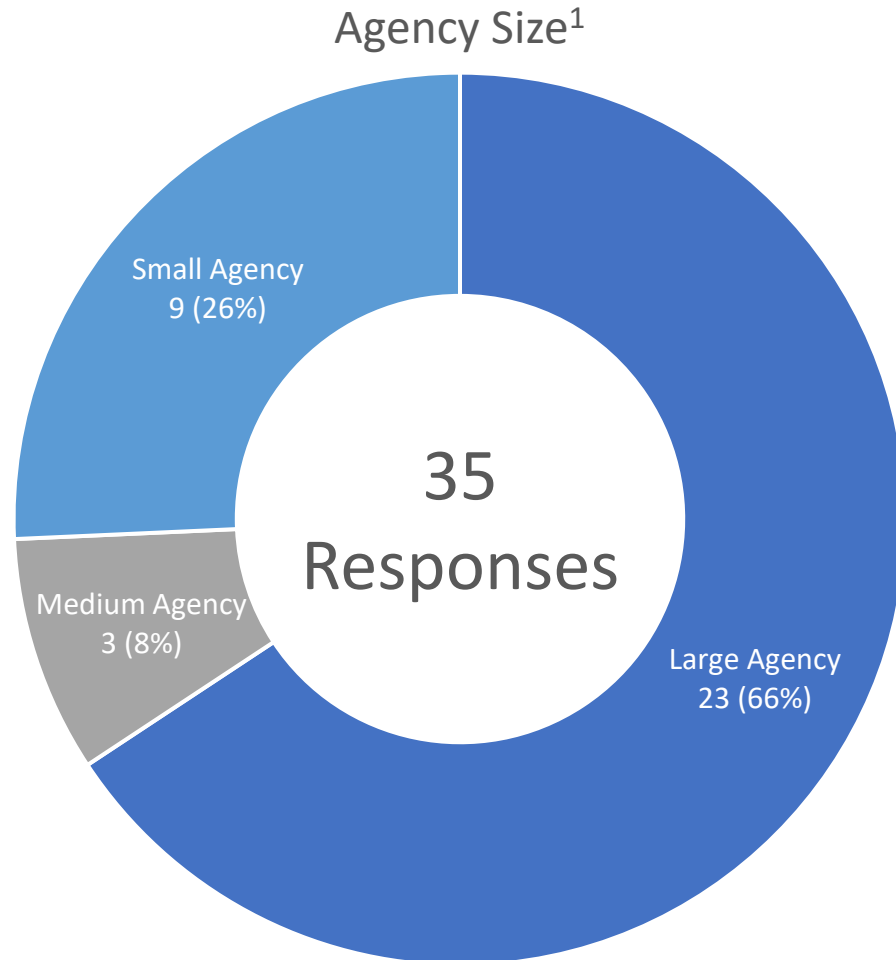
Major Themes

- Regulation
- Online & Automation
- Forms & Templates
- Formulas & Calculations
- Data

Additional Themes

- Centralized Reporting
- Human Error
- Staffing
- Training
- Program Integrity

Survey Statistics

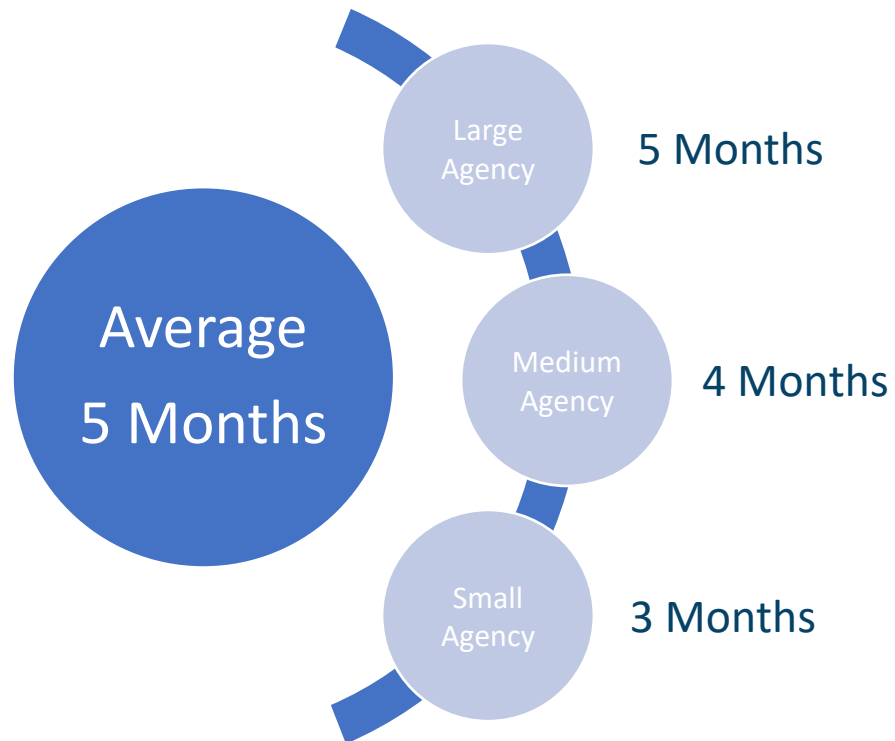


¹ References Survey Question: Are you an EEO officer/staff at a small, medium or large agency?

² References Survey Question: How do you submit your Affirmative Action Plan?

Survey Statistics

Average Time Spent Preparing Content of AA Plans³



Focus of Agency's Leadership⁴



³ References Survey Question: How much time does it take to prepare the content of the plan?

⁴ References Survey Question: Which section has the most focus from your agency's leadership?

EEO Voices

- “Making the AA Plan **easier/less cumbersome** should **not dilute the impact of EEO/AA in [Connecticut]**. Currently, the reporting requirements are stringent but reasonable.”
- “Once [the resulting proposed changes to the current AA regs] are passed and implemented, those **revised regulations will greatly improve the process of preparing and submitting AA Plans** while **keeping the intent and integrity of the AA regulations.** ”
- “Our job is to keep our commissioners off the front page of the Hartford Courant or the New Haven Register. We do this daily without our commissioner knowing this.”
- “I think the current regulations/plan submittal meet the spirit/intent of the [State] of [Connecticut’s] commitment to AA/EEO. ”
- “Hire more EEO staff within state agencies! **Don't water down civil rights!**”
- “Audit State Agencies to **Ensure their AAPs are implemented.**”

EEO's Ideas for Streamlining Plan Preparation & Submission⁵

Theme	% Mentions	Thoughts from EEOs
Regulation <ul style="list-style-type: none"> • Eliminate 25+ categories • Biennial filings for larger agencies • Remove applicant flow charts 	43%	"Streamlining the process of writing the Goals Analysis sections, condensing the written narratives."
Formulas & Calculations	37%	"A lot of time now is spent on formatting spreadsheets on top of analyzing the data, and there is a lot of room for error when inserting my own formulas."
Online / Automation <ul style="list-style-type: none"> • Online upload of pdf • File electronically via a portal. 	34%	"The current standard of review is antiquated..."
Forms / Templates <ul style="list-style-type: none"> • Accurate templates for Analyses 	20%	"If standardized forms are provided to all state agencies, those forms could ... have the formulas needed, such as to round up across the availability analysis."
Data <ul style="list-style-type: none"> • Less manual data entry 	20%	"CORE data entered needs to be consistent."

⁵ References Survey Question: What changes, if any, would you make to improve the process of preparing and submitting Affirmative Action Plans?



Ranking & Response

Ranking & Response: Manual Data Entry Sections

Top 5 sections that require the most manual data entry⁶

1. Goals Analysis
2. Workforce Analysis
3. Utilization Analysis and Hiring and Promotion Goals
4. Employment Analysis
5. Availability Analysis

Thoughts on how to streamline data entry⁷

- “If the proper data were stored in Core-CT it could generate the report in a format that I could use without needing to count employees individually.”
- “Use a system that pulls data from Core-CT to do the calculations electronically (without them being done manually).”
- “Get access to better [Core-CT] Reports the ‘canned’ reports developed years ago are not meeting the needs of my agency. ”

⁶ References Survey Question: Rank the top 5 element(s) of the plan that require the most manual data entry.

⁷ References Survey Question: What are your thoughts on how to streamline data entry to save time?

Ranking & Response: Error Prone Sections

Top 5 sections that are most prone to error⁸

1. Goal Analysis
2. Availability Analysis
3. Utilization Analysis and Hiring and Promotion Goals
4. Employment Analyses
5. Workforce Analysis

Main causes for errors in the sections⁹

- “A lot of research goes into Goals Analysis and the narrative must cover all hires/promotions, with meticulous accounting regarding unsuccessful goal candidate.”
- “Human error - there is a lot of data that needs to be manipulated and sorted before it can even be reported on.”
- “If some of the formulas are not working or totals on one sheet do not match the totals on the subtotals sheet, an [error] could occur.”

⁸ References Survey Question: Rank the top 5 element(s) of the plan that are most prone to error.

⁹ References Survey Question: What are the main causes for errors in the sections selected above?

Ranking & Response: Duplication

Top 5 sections that may contain duplicated content¹⁰

1. Utilization Analysis and Hiring And Promotion Goals
2. Goals Analysis
3. External Communication and Recruitment Strategies
4. Employment Analyses
5. Workforce Analysis

Thoughts on how we can reduce duplication of content¹¹

- “Have less narratives and less repetition of data. For example, the workforce analysis data is summarized, then broken out into separate sections, then repeated availability, utilization, and employment analyses.”
- “Condense the narratives. Innovative, External, and Internal all blend together. The Goals Analysis and App Flows in the Employment section contain nearly the same information and could also be condensed.”

¹⁰ References Survey Question: Rank the top 5 element(s) of the plan that may contain duplicated content across sections.

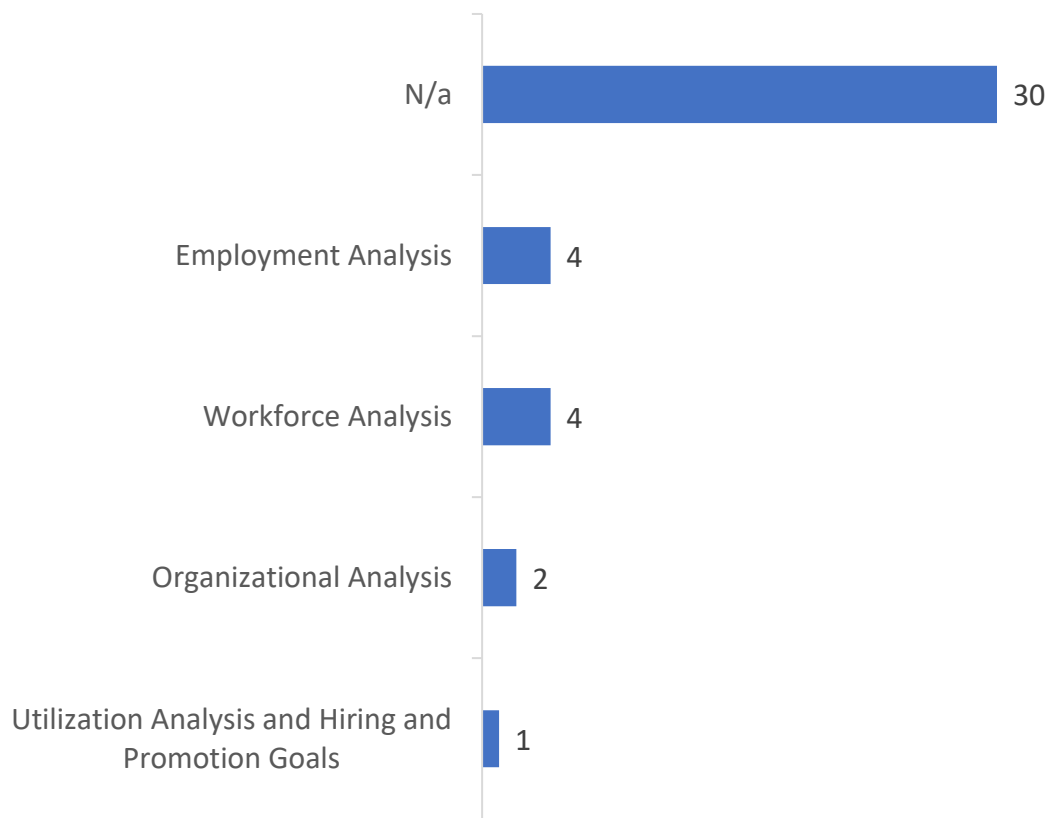
¹¹ References Survey Question: What are your thoughts on how we can reduce duplication of content across sections?



Tools

Tools: STARS

Sections Where Respondents Utilize STARS¹²



Thoughts on how STARS can be further utilized¹³

- “STARS is a nice format, but the reports are inaccurate, and we rely on core which is more work when balancing our workforce”
- “STARS we use for one report on Age, but it is always slightly different than the EPM Core-CT reports we run so we rely on the EPM report instead.”
- “Core-CT/STARS still requires manual validation as we only report out full-time permanent employees in the AA plan.”
- “Generate a report [from STARS] to pull all required AA Plan data.”

¹² References Survey Question: Which section(s) do you utilize STARS? Select all that apply.

¹³ References Survey Question: What are your thoughts on how the aforementioned tools (Excel, Core-CT, STARS, etc.) can be further utilized to streamline preparing plans?

Tools: JobAps

Sections Where Respondents Utilize JobAps¹⁴



Thoughts on how JobAps can be further utilized¹⁵

- “We should have full access to review and pull reports as needed to assess the AA/EEO program for our agency.”
- “Allow full access and not go through human resources for certain information.”
- “JobAps self-reporting Race/Sex data does not connect to Core-CT and is sometimes 'blank' or reported as 'NSPEC' in Core-CT.”

¹⁴ References Survey Question: Which section(s) do you utilize JobAps? Select all that apply.

¹⁵ References Survey Question: What are your thoughts on how the aforementioned tools (Excel, Core-CT, STARS, etc.) can be further utilized to streamline preparing plans?



Conclusion

Top 4 Ideas Presented

- Improve data accuracy and reporting from Core-CT/STARS to enable analyses for AA plan
- Standard forms/templates with formulas to perform all analyses
- Platform to compile and file plan electronically
- Condense similar sections

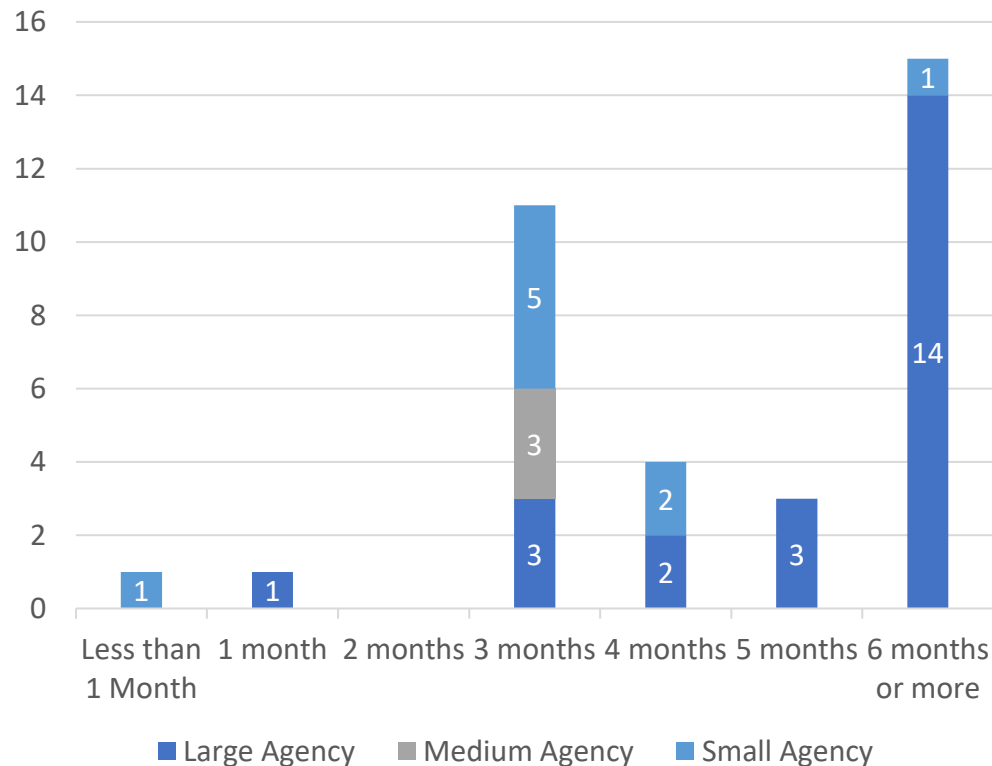
Questions?



Appendix

Breakdown of Survey Statistics

Time to Needed to Prepare Content of Plan*



Average Time Spent on AA Plan Calculations**



* References Survey Question: How much time does it take to prepare the content of the plan?

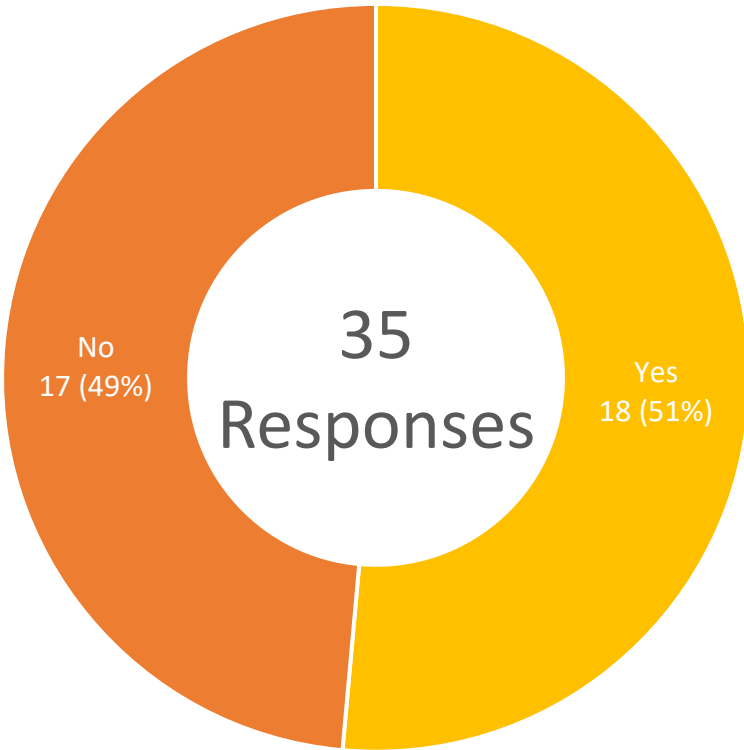
** References Survey Question: How many hours does it take to complete all the calculations?



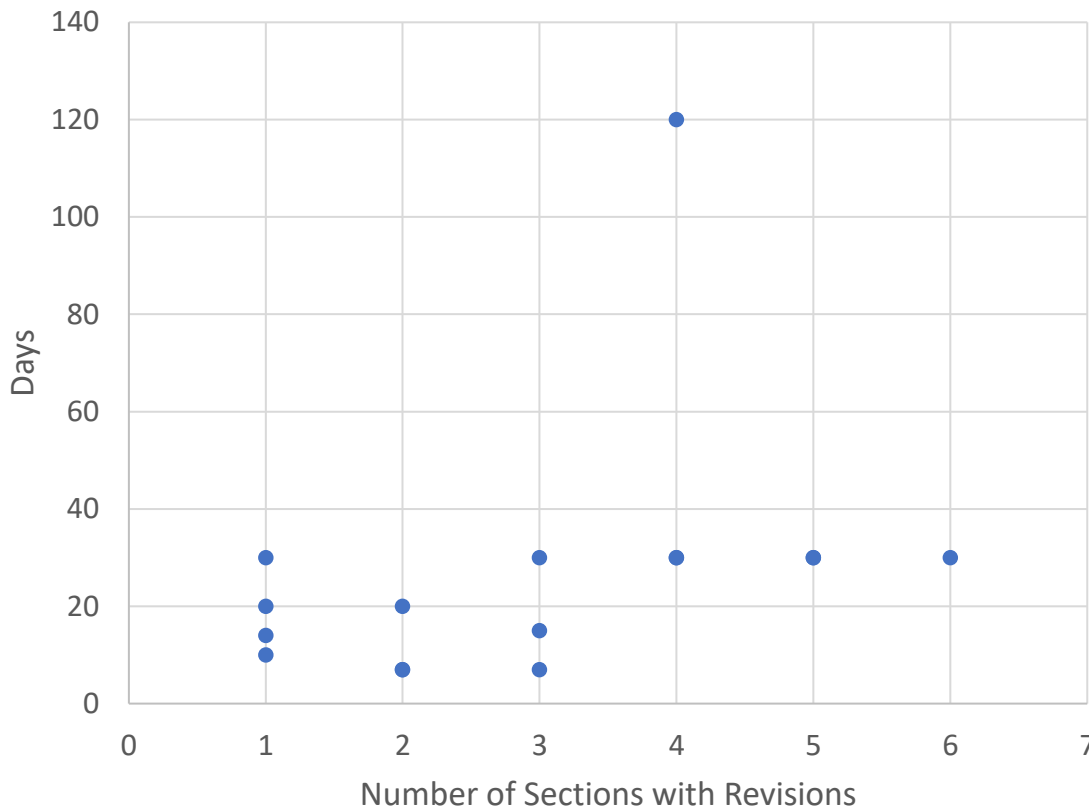
Revision

Affirmative Action Revision Analysis

Have Respondents Submitted a Revision?¹⁶



Number of Days Since Initial Plan Submission^{17*}



¹⁶ References Survey Question: Have you submitted a revision to your agency’s affirmative action plan after it has been submitted?

¹⁷ References Survey Question: If yes, how many sections included revisions? & If yes, how long after the initial submission was the revision submitted? Provide number of days.

* Two ‘Yes’ responses were excluded due to invalid responses.



Additional Tools

Tools: Core-CT

Sections where respondents utilize CORE-CT¹⁸



Thoughts on how CORE-CT can be further utilized¹⁹

- “Standardize and correct the data [in] reports so that when a transfer or promotion from another state agency occurs it is considered a hire.”
- “Standardized EEO reports from Core-CT and STARS”
- “Core-CT is 4 weeks behind in entering new & promoted employees. Therefore, to do "accurate" analysis of the Plan year one has to wait one month before assessing the information.”
- “Create consistent guidelines for HR when inputting data into CORE-CT.”

¹⁸ References Survey Question: Which section(s) do you utilize Core-CT? Select all that apply.

¹⁹ References Survey Question: What are your thoughts on how the aforementioned tools (Excel, Core-CT, STARS, etc.) can be further utilized to streamline preparing plans?

Tools: Excel

Sections where respondents utilize Excel²⁰



Thoughts on how Excel can be further utilized²¹

- “Get the data from these sources but if they were automatically input into usable spreadsheets.”
- “Create set templates in Excel that can be used across all State Agencies to enter data in each section as applicable with pre-set formulas.”

²⁰ References Survey Question: Which section(s) do you utilize Excel? Select all that apply.

²¹ References Survey Question: What are your thoughts on how the aforementioned tools (Excel, Core-CT, STARS, etc.) can be further utilized to streamline preparing plans?

The End

Draft High Level Implementation Plan

Recommendation Number	Recommendation Description	Lead	Effort Level	Approx. Time to Complete
1	Develop requirements and select platform to implement an online application to create and review affirmative action plans.	CHRO/BITS	High	TBD
2	Develop CHRO-approved templates for plan development and finalize with EEO Officers.	CHRO/OPM	Medium	3 months
3	Finalize STARS queries to extract plan data and make reports accessible.	OPM	Medium	3 months
4	Determine strategy and language to encourage employees to update demographic information to improve Core-CT data quality.	DAS	High	TBD
5	Provide resources for EEO Officers on the CHRO website and develop additional training materials.	CHRO	Medium	24 months
6	Develop online resources to improve access to standard census data.	CT Data Collaborative	Medium	6 months
7	Ensure EEO Officers have access to applicant data for goals analysis.	DAS	High	TBD
8	Convene work group to ensure consistent demographic categories across Connecticut data systems.	CHRO/DAS/OSC	Medium	TBD
9	Plan to re-evaluate reporting and plan correction timelines after automating the process.	CHRO	Medium	12 months (after completion of 1 - 4)
10	Plan to re-evaluate increasing the threshold for availability analysis to reduce agency burden.	CHRO	Medium	24 months

Number	Feature	Role	User Story	Acceptance Criteria	Priority Level
1	Notifications - Electronic Filling System	CHRO Reviewer	As a CHRO Reviewer I want to send a notification to agencies so that agencies can begin filling their plan using an electronic system.	Given that a system is in place to file plans electronically (Sec. 46a-68-76 Submission of a plan electronically), then the system must allow reviewers to send a notification to agencies notifying them to file using this system.	Eliminate
2	Application Submission - Timestamp	CHRO Reviewer	As a CHRO Reviewer I want to view the timestamp for when the AA plan was submitted so that I can verify when the plan was submitted.	Given that the agency submits its plan, the system must display the date and time the plan was submitted. Plans submitted on or before the filling date will be labeled: Timely Plans submitted after the filing date will be labeled: Untimely	Nice to Have
3	Notifications - Plan Received	CHRO Reviewer	As a CHRO Reviewer I want to notify agencies that their plan has been received so that they know when the Commission will vote on their plan.	Given that a agency plan was submitted, then the system must notify the agency: 1.) Date when the plan was received 2.) Date when the plan will be presented to the Commission	Nice to Have
4	Application Creation - Plan Elements	EEO	As an EEO I want to view the sections of the plan so that I can complete the plan.	The elements of the plan detailed in the Sec. 46a-68-77 Elements of an affirmative action plan must be present: 1. Policy statement; 2. Internal communication; 3. External communication and recruitment strategies; 4. Assignment of responsibility and monitoring; 5. Organizational analysis; 6. Workforce analysis; 7. Availability analysis; 8. Utilization analysis and hiring and promotion goals; 9. Employment analyses; 10. Identification of problem areas; 11. Upward mobility program and goals; 12. Good faith efforts; 13. Program goals; 14. Discrimination complaint process; 15. Goals analysis; 16. Innovative programs; and 17. Concluding statement and signature.	Required
5	Analysis - Organizational Analysis	EEO	As an EEO I want to complete an organizational analysis so that I am in compliance with the law.	The system must allow the submission of an Organization Chart.	Required
6	Analysis - Workforce Analysis	EEO	As an EEO I want to complete a workforce analysis so that I am in compliance with the law.	Given that the data is present in the system, then the system must produce the workforce analysis according to Sec. 46a-68-83 Workforce analysis.	Required

Number	Feature	Role	User Story	Acceptance Criteria	Priority Level
7	Analysis - Availability Analysis	EEO	As an EEO I want to complete an availability analysis so that I am in compliance with the law.	Given that the data is present in the system, then the system must produce the availability analysis according to Sec. 46a-68-84 Availability analysis.	Required
8	Analysis - Utilization analysis and hiring and promotion goals	EEO	As an EEO I want to complete a utilization analysis and hiring and promotional goals so that I am in compliance with the law.	Given that the data is present in the system, then the system must produce the utilization analysis and hiring and promotional goals according to Sec. 46a-68-85 Utilization analysis and hiring and promotion goals.	Required
9	Analysis - Employment Analysis	EEO	As an EEO I want to complete a employment analysis so that I am in compliance with the law.	Given that the data is present in the system, then the system must produce the employment analysis according to Sec. 46a-68-86 Employment analysis.	Required
10	Notifications - Recommendation	CHRO Reviewer	As a CHRO Reviewer I want to send a letter with a summary for the plan so that the agency has a copy of the recommendation.	Given that the recommendation is finalized, the system must transit the recommendation to the agency.	Nice to Have
11	Plan Creation - Access	EEO	As an EEO I want to view my agency's plan so that I can complete my agency's plan.	Given that the user has access to the system, they must only be able to view their agency's plan.	Required
12	Plan Review - Access	CHRO Reviewer	As a CHRO Reviewer I want to view all agency plans submitted so I can review the plans.	Given that the user has access to the system, they must be able to view all agency plans submitted.	Required
13	Plan Creation - Data	EEO	As an EEO I want the data needed for the various analyses present so that I can be compliant with the law.	<p>Given that the system is availability for users, the following data must be made available in the system:</p> <ul style="list-style-type: none"> - (Employment Figures aka Availability) Census 2014-2018 EEO tabulations (https://www.census.gov/acs/www/data/eo-data/eo-tables-2018/tableview.php?geotype=state&state=04000us09&filetype=all1r&geoName=Connecticut) - 2014 - 2018 Census EEO Tabulation Occupation Codes - Job Titles for the state (CORE) determined By DAS - Position Classifications (CORE) determined by DAS (EEO Groups) - Salary (CORE) --and Range(CORE) - Workforce Age (CORE) - Workforce Sex (CORE) - Workforce Race (CORE) - Number of individuals in the workforce with a disability (CORE) - Client population (Optional) - IPEDS 	Required
14	Plan Review - Workflow	EEO	As a EEO I want to track the status of the plan so that the plan is submitted.	TBD	Nice to Have
15	System Workflow	System Admin	As the System Admin, I want the system to follow the workflow to that system runs smoothly.	The system should facilitate the attached workflow.	Nice to Have

Number	Feature	Role	User Story	Acceptance Criteria	Priority Level
16	Plan Submission - Corrections	EEO	As an EEO I want to make changes to my submitted plan so that can correct my plan with the window for correction.	Given that the plan was submitted by the filling date and within the window for correction detailed in Sec. 46a-68-97 "Affirmative action plan reporting periods", then the system must allow the user to make change to any part of their submission.	Required
17	Plan Submission - Corrections	CHRO Reviewer	As a CHRO reviewer I want to view the changes made by an agency during the window for correction so that I can thoroughly review the agency's plan.	Given that an agency made changes to their original submission of their plan, the system must identify where changes have been made.	Required
18	Plan Review - Analysis	CHRO Reviewer	As a CHRO Reviewer I want to compare sections of the plan so that I can ensure that there are no mistakes in the analyses for the plan.	Given that a plan is submitted, the system must compare the following values to ensure the following values across the plan match: (TBD)	Nice to Have
19	Plan Archive	CHRO Reviewer	As a CHRO Reviewer, I want to archive the plan, evaluation, and letter of commitment (it applicable) so that I am in compliance with the record retention policy.	Given that an agency has completed the process, the system must retain all related documents according to the record retention policy.	Required
20	Notification - Submission Deadline	CHRO Reviewer	As a CHRO Reviewer, I want to alert agencies about upcoming and past deadlines to so that they are reminded to submit their plan.	Given the current filling schedule, the system must notify agencies 30 days prior to their filling date and 1 day after missing the deadline and each week afterwards (confirm notification cadence with CHRO)	Nice to Have
21	Reporting	CHRO Reviewer	As a CHRO Reviewer, I want to annually report on the plan submissions so that I can report to the governor's office.	Given the end of the fiscal year, the system must produce a report containing the following information for each agency's' plan: - Agency Name - Filling Status - timeliness of Filling - Staff Recommendation - Commission Action - Diversity & Inclusion Requirements Met - Justification (A, B 1-3, B4)	Nice to Have
22	Notification - Signed Summary	CHRO Reviewer	As a CHRO Reviewer, I want to send the summary to the members of the commission so that the members have the documents in preparation for the commission meeting.	Given that the CHRO reviewers have written a summary and the CHRO leadership has signed off on the summary, the system must transmit the signed summary to all the members of the commission.	Nice to Have

Section	Subsection	Current Regulation Verbiage	Action	Confirmed?	Sample Expected Item(s)	Confirmed	Additional Notes	Proposed Statement Change	Action (Proposed)
46a-68-75 Definitions	n/a	As used in sections 46a-68-75 to 46a-68-114, inclusive, of the Regulations of Connecticut State Agencies:(1)Advers	None	Yes	n/a			As used in sections 46a-68-75 to 46a-68-114, inclusive, of the Regulations of Connecticut State Agencies:(1)Advers	None
46a-68-76 Submission of a plan electronically	n/a	In accordance with the provisions of 46a-68 of the Connecticut General Statutes the commission shall supply each agency required to file a state affirmative action plan with notification by first class mail, facsimile machine, electronic mail or a file transfer protocol not less than one year before the agency's next plan is to be submitted that the Commission on Human Rights and Opportunities has approved an electronic filing system and such system shall be used to file state affirmative action plans electronically. An agency may opt to file a state affirmative action plan electronically prior to receiving notification to do so if the agency so chooses.	None	Yes	n/a			None	None
46a-68-77 Elements of an affirmative action plan	n/a	To satisfy the requirements of section 46a-68 of the Connecticut General Statutes, and sections 46a-68-75 to 46a-68-114, inclusive, of the Regulations of Connecticut State Agencies an agency shall submit an affirmative action plan to the Commission on Human Rights and Opportunities in electronic form upon notification pursuant to section 46a-68-76 of the Regulations of Connecticut State Agencies using an electronic program prescribed by the Commission on Human Rights and Opportunities and such affirmative action plan shall contain or reference the following elements: 1. policy statement; 2. internal communication; 3. external communication and recruitment strategies; 4. assignment of responsibility and monitoring; 5. organizational analysis; 6. workforce analysis; 7. availability analysis; 8. utilization analysis and hiring and promotion goals; 9. employment analyses; 10.identification of problem areas; 11.upward mobility program and goals; 12.program goals; 13.discrimination complaint process; 14.goals analysis; 15.innovative programs; and 16.concluding statement and signature.	Evidence	Yes	The Plan	Yes		1. policy statement; 2. internal communication; 3. external communication and recruitment strategies; 4. assignment of responsibility and monitoring; 5. organizational analysis; 6. workforce analysis; 7. availability analysis; 8. utilization analysis and hiring and promotion goals; 9. employment analyses; 10. identification of problem areas; 11. upward mobility program and goals; 12. good faith efforts; 13. program goals; 14. discrimination complaint process; 15. goals analysis; 16. innovative programs; and 17. concluding statement and signature.	Combination
46a-68-78 Policy Statement	a	An agency shall submit an affirmative action plan which shall contain a policy statement that: (1) identifies the purpose and need for affirmative action and equal employment opportunity; (2) identifies the classes protected under all federal and state constitutions, laws, regulations, and executive orders that prohibit or outlaw discrimination; (3) establishes affirmative action as an immediate and necessary agency objective; (4) pledges the agency to take affirmative steps to provide services and programs in a fair and impartial manner; (5) recognizes the hiring difficulties experienced by individuals with disabilities and by many older persons and sets program goals for action to overcome the present effects of past discrimination, if any, to achieve the full and fair utilization of such persons in the workforce; (6) advises employees of the existence of the agency's internal complaint procedures; and (7) identifies the agency equal employment opportunity officer or person assigned affirmative action duties by name, position or position classification, address and telephone number.	Evidence	Yes	Signed policy statement (Upload, Link)	Yes		An agency shall submit an affirmative action plan which shall contain a policy statement that: (1) identifies the purpose and need for affirmative action and equal employment opportunity; (2) identifies the classes protected under all federal and state constitutions, laws, regulations, and executive orders that prohibit or outlaw discrimination; (3) establishes affirmative action as an immediate and necessary agency objective; (4) pledges the agency to take affirmative steps to provide services and programs in a fair and impartial manner; (5) recognizes the hiring difficulties experienced by individuals with disabilities and by many older persons and sets program goals for action to overcome the present effects of past discrimination, if any, to achieve the full and fair utilization of such persons in the workforce; (6) advises employees of the existence of the agency's internal complaint procedures and how employees can access and view the procedures; and (6) identifies the agency equal employment opportunity officer or person assigned affirmative action duties by name, position or position classification, address and telephone number.	Documentation
46a-68-78 Policy Statement	b	The policy statement shall be signed and dated by the appointing authority and each subsequent appointing authority and shall evidence his or her commitment to achieve the goals set forth in the plan.	Evidence	Yes	Signed policy statement (Upload, Link)	Yes		The policy statement shall be signed and dated by the appointing authority prior to each affirmative action plan filing and shall evidence his or her commitment to achieve the goals set forth in the plan.	Documentation
46a-68-79 Internal communication	a	The policy statement and a summary of the objectives of the plan shall be posted by the agency in a prominent and accessible location and distributed, electronically where practicable, and in written form where electronic distribution is not practicable, at least annually to all agency employees. All employees shall be notified, by the agency head or designee of their right to a reasonable period to review and comment upon the agency affirmative action plan. All comments regarding the agency affirmative action plan shall be addressed to the equal employment opportunity officer, who shall be identified by name and address in all agency affirmative action plan communications.	Evidence	Yes	Summary of Objectives (Upload/Typed)	Yes		The policy statement shall be posted by the agency in a prominent and accessible location and distributed [electronically where practicable, and in written form where electronic distribution is not practicable, at least] annually to all agency employees. All employees shall be notified, by the agency head or designee of their right to a reasonable period to review and comment upon the agency affirmative action plan As evidence of its compliance with this subsection, the agency shall include in its plan submission the cover letter included in the distribution of the policy statement that demonstrates that the policy statement was distributed to all employees.	Attestation
46a-68-79 Internal communication	b	The agency shall maintain, as required by the agency's state library records retention schedules for state agencies, copies of all affirmative action-related internal communications and comments received pursuant to subsection (a) of this section and note the date such comments were received.	None	Yes	n/a			The agency shall outline what steps it took during the reporting period to comply with the requirements of sections	Attestation
46a-68-79 Internal communication	c	The agency shall outline what steps it took during the reporting period to comply with the requirements of sections 46a-54(15)(A) and 46a-54(16) of the Connecticut General Statutes. The plan shall note all participants trained during the reporting period by race and sex.	Evidence	Yes	Summary and participants (Upload/Typed)	Yes		The agency's plan shall show that good faith efforts were made to ensure a fair and nondiscriminatory selection process and to 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.	Combination
46a-68-79 Internal communication	d	The agency's plan shall state the period of time employees of such agency have been given to review and comment upon the agency affirmative action plan and shall include a summary of all comments from employees concerning the plan and note any changes made to the plan based on those comments. The plan shall further indicate the activities undertaken during the reporting period to comply with this section.	Evidence	Yes	Summary of comments and actions taken (Upload/Typed)	Yes		The agency's plan shall state the period of time employees of such agency have been given to review and comment upon the agency affirmative action plan and shall include a summary of all comments from employees concerning the plan and note any changes made to the plan based on those comments. All comments regarding the agency affirmative action plan shall be addressed to the equal employment opportunity officer, who shall be identified by name and address in all agency affirmative action plan communications. The agency shall maintain, as required by the agency's state library records retention schedules for state agencies, copies of all affirmative action-related internal communications and comments received pursuant to subsection (a) of this section and note the date such comments were received.	Combination
46a-68-80 External communication and Recruitment	a	Each agency shall develop means of recruiting goal candidates for current positions.	Evidence	Yes	Narrative (Upload/Typed)	Yes		None	Unsure
46a-68-80 External communication and Recruitment	b	Each agency shall put itself on public record as an affirmative action and equal employment opportunity employer. Consistent with that posture: (1) written expression of the agency's commitment to affirmative action and equal employment opportunity and notice of job availability shall be sent regularly to recruiting sources and organizations which are capable of referring qualified applicants for employment; and (2) notice that the agency is an affirmative action and equal employment opportunity employer shall be sent to all unions that represent agency employees for collective bargaining purposes. Such notice shall contain an invitation to review and comment upon the agency's affirmative action plan.	Attestation	Yes				Each agency shall put itself on public record as an affirmative action and equal employment opportunity employer.	Attestation
46a-68-80 External communication and Recruitment	c	Each agency shall initiate and undertake vigorous, positive relationship-building activity to ensure that affirmative action is more than a paper commitment. Each agency shall work to secure ongoing relationships and develop additional recruiting sources while cultivating outreach recruitment programs and maintaining contact with protected class members and resource agencies.	Attestation	Yes				None	Attestation
46a-68-81 Assignment of responsibility and monitor	a	Each appointing authority of an agency shall have the ultimate responsibility for the development, implementation, and monitoring of the agency's affirmative action plan.	None	Yes	n/a			Each appointing authority of an agency shall have the ultimate responsibility for the development, implementation,	None
46a-68-81 Assignment of responsibility and monitor	b	Subject to the provisions of chapters 67 and 68 of the Connecticut General Statutes, the appointing authority may assign to any employee of the agency such duties and responsibilities necessary for the development, implementation and monitoring of the agency affirmative action plan. To acquaint employees with their specific responsibilities under the plan, the appointing authority shall schedule regular meetings that emphasize: (1) human relations and intergroup relations; (2) nondiscriminatory employment practices; (3) the legal authority for affirmative action and equal employment opportunity and the appointing authority's commitment to affirmative action; (4) review of the affirmative action plan; and (5) identification of obstacles in meeting the goals of the plan.	Evidence	Yes	Narrative	Yes	Ex. Meeting minutes	Each agency shall designate a full-time or part-time equal employment opportunity officer. The equal employment opportunity officer shall report directly to the appointing authority on all matters concerning affirmative action, discrimination, and equal employment opportunity and shall have access to all records and shall receive prompt cooperation from the personnel necessary for the effective performance of his or her duties. An organizational chart demonstrating that the equal employment opportunity officer reports directly to the agency head shall be included in the agency's plan. Equal employment opportunity officers shall, at a minimum: (1) develop, maintain and monitor the agency affirmative action plan; (2) initiate and maintain contact with recruiting sources and organizations serving members of protected classes; (3) inform the agency of developments in affirmative action law; and (4) mitigate any discriminatory conduct and investigate discrimination complaints.	Unsure

Section	Subsection	Current Regulation Verbiage	Action	Confirmed?	Sample Expected Item(s)	Confirmed	Additional Notes	Proposed Statement Change	Action (Proposed)
46a-68-75 Definitions	n/a	As used in sections 46a-68-75 to 46a-68-114, inclusive, of the Regulations of Connecticut State Agencies:(1)Advers	None	Yes	n/a			As used in sections 46a-68-75 to 46a-68-114, inclusive, of the Regulations of Connecticut State Agencies:(1)Advers	None
46a-68-81 Assignment of responsibility and monitor	c	Each agency shall designate a full-time or part-time equal employment opportunity officer. The equal employment opportunity officer shall report directly to the appointing authority on all matters concerning affirmative action, discrimination, and equal employment opportunity and shall have access to all records and shall receive prompt cooperation from the personnel necessary for the effective performance of his or her duties. Equal employment opportunity officers shall, at a minimum: (1) develop, maintain and monitor the agency affirmative action plan; (2) initiate and maintain contact with recruiting sources and organizations serving members of protected classes; (3) inform the agency of developments in affirmative action law; and (4) mitigate any discriminatory conduct and investigate discrimination complaints.	None	Yes	n/a			Subject to the provisions of chapters 67 and 68 of the Connecticut General Statutes, in conjunction with the equal c	Attestation
46a-68-81 Assignment of responsibility and monitor	d	Each agency of one hundred (100) or more employees shall consider the feasibility of establishing an employee advisory and diversity committee. The committee, if established, may consider any matter appropriate to the development and implementation of the affirmative action plan. Members of the committee may be appointed by the appointing authority, in consultation with the equal employment opportunity officer or other individual, or elected by the employees at large. The committee shall include representatives from a geographical, occupational category and protected class cross-section of the workforce. Subject to chapters 55 and 68 of the Connecticut General Statutes, the committee shall have access to agency records necessary for the effective performance of its duties.	Attestation	Yes			Yes/No Options If yes, provide narrative	Each agency of one hundred (100) or more employees shall consider the feasibility of establishing an employee adv	Unsure
46a-68-81 Assignment of responsibility and monitor	e	The agency shall maintain and submit a record of each member of the employee advisory and diversity committee, identified by name, race, sex, position or position classification and percentage of time devoted to such duties. Copies of all committee meeting minutes and of any recommendations made to the equal employment opportunity officer, including whether the recommendations were accepted or rejected by the agency, shall be likewise retained, as required by the agency's records retention schedules for state agencies. If the agency determines that an employee advisory and diversity committee is unnecessary to the development or implementation of the affirmative action plan, the affirmative action plan shall so state.	Evidence	Yes	Narrative (Upload/Typed)	Yes		The agency shall maintain and submit a record of each member of the employee advisory and diversity committee, identified by name, race, sex, position or position classification . Copies of all committee meeting minutes and of any recommendations made to the equal employment opportunity officer, including whether the recommendations were accepted or rejected by the agency, shall be likewise retained, as required by the agency's records retention schedules for state agencies. If the agency determines that an employee advisory and diversity committee is unnecessary to the development or implementation of the affirmative action plan, the affirmative action plan shall so state.	Documentation
46a-68-81 Assignment of responsibility and monitor	f	Each agency shall evaluate and monitor the affirmative action performance of any employee assigned affirmative action responsibilities. Subject to chapters 67 and 68 of the Connecticut General Statutes, such performance shall be considered in promotion and merit increase decisions, and the affirmative action plan shall so state.	Evidence	Yes	List of persons creating the plan (Upload/Typed)	Yes		Each agency shall evaluate and monitor the affirmative action performance of any employee assigned affirmative action responsibilities. Subject to chapters 67 and 68 of the Connecticut General Statutes, such performance shall be considered in promotion and merit increase decisions, and the affirmative action plan shall so state.	Documentation
46a-68-81 Assignment of responsibility and monitor	g	No employee shall be coerced, intimidated or retaliated against by the agency or any person for performing any of the duties recited in this section. Any person so aggrieved may file a complaint with the Commission on Human Rights and Opportunities, provided that nothing herein shall preclude an agency from disciplining or discharging an employee for just cause.	None	Yes	n/a			No employee shall be coerced, intimidated or retaliated against by the agency or any person for performing any of t	None
46a-68-81 Assignment of responsibility and monitor	h	The agency shall maintain and submit a record of each person performing any duty related to the development or implementation of the affirmative action plan by name, job, title and percentage of time devoted to affirmative action duties and outline specific responsibilities. If the equal employment opportunity officer performs other duties, the plan will identify such duties.	Evidence	Yes	List of persons creating the plan (Upload/Typed)	Yes		The agency shall maintain and submit a record of each person performing any duty related to the development or implementation of the affirmative action plan by name, job, title and percentage of time devoted to affirmative action duties and outline specific responsibilities. If the equal employment opportunity officer performs other duties, the plan will identify such duties.	Documentation
46a-68-81 Assignment of responsibility and monitor	i	Each agency shall develop an internal reporting system to continually audit, monitor and evaluate programs essential for a successful affirmative action plan. A system providing for goals, timetables for goals and initiatives and periodic evaluations shall be established and implemented. Consideration shall be given to the following actions: (1) conducting an ongoing review and evaluation of the agency's progress towards the goals of the affirmative action plan. The evaluation shall be directed toward results accomplished, not only at efforts made; (2) establishing a system for evaluating supervisor's performance on affirmative action consistent with chapters 67 and 68 of the Connecticut General Statutes; and (3) reviewing the affirmative action plan at least annually. The equal employment officer shall make an annual report to the head of the agency, containing the overall status of the program, results achieved toward established objectives, identification of any particular problems encountered and recommendations for corrective actions needed.	Evidence	Yes	Evidence of annual report(Upload/Link/Typed)	Yes		Each agency shall develop an internal reporting system to continually audit, monitor and evaluate programs essential for a successful affirmative action plan. A system providing for goals, timetables for goals and initiatives and periodic evaluations shall be established and implemented. Consideration shall be given to the following actions: (1) conducting an ongoing review and evaluation of the agency's progress towards the goals of the affirmative action plan. The evaluation shall be directed toward results accomplished, not only at efforts made; (2) establishing a method for evaluating supervisor's performance on affirmative action consistent with chapters 67 and 68 of the Connecticut General Statutes; and (3) reviewing the affirmative action plan at least annually. The equal employment officer shall make an annual report to the head of the agency, containing the overall status of the program, results achieved toward established objectives, identification of any particular problems encountered and recommendations for corrective actions needed.	Attestation
46a-68-82 Organizational analysis	n/a	Each agency shall prepare an occupational category and job title study in the following manner: (1) Each agency shall conduct a job title classification study. The study shall use job titles authorized by the Department of Administrative Services or established by statute which shall be arranged into lines of progression that depict the order of jobs through which an employee may advance. Titles without promotional opportunity shall be listed separately. Unclassified titles shall be so identified. (2) Each agency shall conduct an occupational category study. Each job title listed in the job title classification study shall be placed in an occupational category with other job titles having similar job content, compensation schedules and opportunity. Titles within an occupational category shall be ranked from the highest to lowest compensation schedule. The salary range for each office, position and position classification shall be noted. (3) Organizational charts shall be included in this section of the plan to illustrate lines of progression and reporting.	Evidence	Yes	Org Chart, Job title and Category study (Upload, Typed)	Yes		Each agency shall prepare an occupational category and job title study in the following manner: (1) Each agency shall conduct a job title classification study. The study shall use job titles authorized by the Department of Administrative Services or established by statute which shall be arranged into lines of progression that depict the order of jobs through which an employee may advance. Titles without promotional opportunity shall be listed separately. Unclassified titles shall be so identified. (2) Each agency shall conduct an occupational category study. Each job title listed in the job title classification study shall be placed in an occupational category with other job titles having similar job content, compensation schedules and opportunity.	Documentation
46a-68-83 Workforce analysis	a	Each agency shall report the racial and sexual composition of its full-time employees for each office, position and position classification identified in the job title study on forms prescribed by the Commission on Human Rights and Opportunities staff. A separate analysis shall be performed for part-time and other employees. The workforce analysis shall inventory the: (1) total agency workforce by occupational category with percentages of race and sex groups calculated for each occupational category; (2) total agency workforce by office, position and position classification within each occupational category; (3) agency workforce in each relevant labor market area by occupational category; and (4) agency workforce in each relevant labor market area by office, position and position classification within each occupational category.	Evidence	Yes	Analysis (Data Entry)	Yes		None	Documentation
46a-68-83 Workforce analysis	b	Each agency shall report the age groupings of its full-time workforce by occupational category, in five year increments as prescribed by the Commission on Human Rights and Opportunities staff; and	Evidence	Yes	Analysis (Data Entry)	Yes	Use CHRO provide form	None	Documentation
46a-68-83 Workforce analysis	c	Each agency shall report the number of physically disabled persons in its full-time workforce by occupational category.	Evidence	Yes	Analysis (Data Entry)	Yes		Each agency shall report the number of persons with disabilities in its fulltime workforce by occupational category.	
46a-68-84 Availability analysis	a	As a preparatory step in determining whether protected classes are fully and fairly utilized in the workforce, each agency shall conduct, at a minimum, an analysis by occupational category to determine the availability base of protected group members for employment. A separate availability analysis shall be conducted, by each agency, for any position classification within an occupational category employing twenty-five (25) or more employees. A separate analysis may be performed by an agency for any job title requiring unique skills, abilities or educational qualifications. The availability analysis shall: Page 10 of 24 (1) examine the job content of each office; position and position classification within an occupational category or, where appropriate, the job content of a position classification; (2) identify the relevant labor market area; and (3) match each office, position and position classification within an occupational category or, where appropriate, a position classification, with the most nearly parallel job title contained in the data source consulted.	Evidence	Yes	Analysis (Data Entry)	Yes	Use CHRO provide Form	As a preparatory step in determining whether protected classes are fully and fairly utilized in the workforce, each agency shall conduct, at a minimum, an analysis by occupational category to determine the availability base of protected group members for employment. A separate availability analysis shall be conducted, by each agency, for any position classification within an occupational category employing twenty-five (25) or more employees. The agency may apply for a modification from the Commission on Human Rights and Opportunities on a case-by-case basis. A separate analysis may be performed by an agency for any job title requiring unique skills, abilities or educational qualifications. The availability analysis shall: (1) examine the job content of each office, position and position classification ; (2) identify the relevant labor market area; and (3) match each office, position and position classification with the most nearly parallel job title contained in the data source consulted.	
46a-68-84 Availability analysis	b	In calculating availability, the following information and data sources shall be consulted by each agency: (1) employment figures; (2) unemployment figures; and (3) the racial and sexual composition of persons in promotable and transferable offices, positions and position classifications.	Evidence	Yes	Data	Yes	Provide data to check their work. Upload the data used accessible. Including promotables.	None	

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46a-68-75 Definitions	n/a	As used in sections 46a-68-75 to 46a-68-114, inclusive, of the Regulations of Connecticut State Agencies:(1)	None	Yes	n/a			As used in sections 46a-68-75 to 46a-68-114, inclusive, of the Regulations of Connecticut State Agencies:(1)Advers	None
46a-68-84 Availability analysis	c	In calculating availability, the following information and data sources may be consulted by an agency: (1) population figures; (2) client population figures; (3) figures for educational, technical and training program graduates and participants; or (4) any other relevant source.	Evidence	Yes	Data	Yes	Provide data to check their work. Upload the data used accessible. Including promotables.	None	
46a-68-84 Availability analysis	d	For each occupational category, position classification or job title analyzed, the plan shall provide the name of each source consulted, explain the basis for selection of each source, and include copies of the specific data. Additionally, where job titles in the source consulted are not identical to the job titles employed by the agency, the plan shall document the job titles deemed most similar to office, position and position classification within an occupational category or, where appropriate, position classification or job title, and substantiate the manner in which the availability base is calculated.	Evidence	Yes	Analysis (Data Entry)	Yes		For each occupational category, position classification or job title analyzed, the plan shall provide the name of each source consulted, explain the basis for selection of each source, and include copies of the specific data. Additionally, where job titles in the source consulted are not identical to the job titles employed by the agency, the plan shall document the job titles deemed most similar to office, position, position classification or job title, and substantiate the manner in which the availability base is calculated.	
46a-68-84 Availability analysis	e	For job titles with twenty-five (25) or more employees in occupational categories where only the entry level positions are filled by hiring and the other job titles in the series are filled by promotion, the availability base shall be calculated by an agency for the entire series and goals will be set for the entire series.	Evidence	Yes	Analysis (Data Entry)	Yes		None	
46a-68-84 Availability analysis	f	The availability base is calculated by determining the sources used to fill positions and the percentage of positions filled from that source. This percentage is the weight assigned to each source. The total weight for all sources cannot exceed one hundred percent (100%). The percent of each race and sex group from each relevant source is multiplied by the weight given to the corresponding source resulting in a weighted factor. The weighted factors for each race and sex group are added to determine the availability base for each race and sex group in each occupational category, position classification, or job title analyzed.	Evidence	Yes	Analysis (Data Entry)	Yes	Part of the whole section	None	
46a-68-84 Availability analysis	g	The plan shall substantiate the manner in which the availability base is calculated.	Evidence	Yes	Analysis (Data Entry)	Yes	Chart shows weights.	None	
46a-68-84 Availability analysis	h	As part of its review the Commission on Human Rights and Opportunities reserves the right to determine the appropriateness of information and data used in subsection (c) of this section and reserves the right to accept or reject such information or data. An agency, with the consent of the executive director of the Commission on Human Rights and Opportunities, may analyze additional labor market areas when specific requirements of a job profile, such as geographic proximity, so require.	Evidence	Yes	Data	Yes		As part of its review the Commission on Human Rights and Opportunities reserves the right to determine the appropriateness of information and data used in subsection (c) of this section and reserves the right to accept or reject such information or data. An agency, with the consent of the executive director of the Commission on Human Rights and Opportunities or his or her designee may analyze additional labor market areas when specific requirements of a job profile, such as geographic proximity, so require.	
46a-68-85 Utilization analysis and hiring and promot	a	To determine whether protected classes are fully and fairly utilized, the representation of protected group persons in the workforce shall be compared, in form or format prescribed by the Commission on Human Rights and Opportunities staff, to the availability of such persons for employment. Comparisons between the agency workforce and the availability base calculated in section 46a-68-84 of the Regulations of Connecticut State Agencies shall be made by occupational category, position classifications employing a significant number of persons and job titles for which a separate base was calculated.	Evidence	Yes	Analysis (Data Entry)	Yes	Used CHRO provided Form	None	
46a-68-85 Utilization analysis and hiring and promot	b	For each instance of underutilization identified in the utilization analysis, employment goals shall be set by an agency to increase the representation of protected class members in the agency workforce. Employment goals shall be set by an agency for job titles filled through original appointment or promotional appointment. The objective of such goals shall be to attain parity with the availability base for such protected class members.	Evidence	Yes	Analysis (Data Entry)	Yes	Used CHRO provided Form	For each instance of underrepresentation identified in the utilization analysis, employment goals shall be set by an agency to increase the representation of protected class members in the agency workforce. Employment goals shall be set by an agency for job titles filled through original appointment or promotional appointment. The objective of such goals shall be to attain parity with the availability base for such protected class members.	
46a-68-85 Utilization analysis and hiring and promot	c	Where the underutilization of race and sex groups, considered individually, does not rise to the level to require a hiring or promotion goal, but where the underutilization of race and sex groups, considered collectively is fifty percent (50%) or greater, a goal shall be set by an agency, based on the race and sex group most underutilized in the occupational category, position classification or job title under consideration or for the race and sex group with the highest availability base, as the agency elects.	Evidence	Yes	Analysis (Data Entry)	Yes	Used CHRO provided Form	Where the underrepresentation of race and sex groups, considered individually, does not rise to the level to require a hiring or promotion goal, but where the underutilization of race and sex groups, considered collectively is negative zero point five (0.5) or less, a goal shall be set by an agency, based on the race and sex group most underutilized in the occupational category, position classification or job title under consideration or for the race and sex group with the highest availability base, as the agency elects. The goal may be filled by hire or promotion.	
46a-68-86 Employment analysis	n/a	Each agency shall undertake a comprehensive review of the employment activity during the reporting period to identify policies and practices that perpetuate or build in barriers to equal employment. Each agency shall perform the following analyses: (1) The agency shall conduct a separate analysis for any occupational category or position classification for which a separate availability base has been calculated and employment activity has occurred during the reporting period through hire, termination or other personnel activity. (2) Appointments to job titles shall be further analyzed. The applicant flow analysis shall track applicants through the hiring or promotional process to identify the step at which they were no longer candidates for employment. Information shall be provided as required for reductions in workforce. (3) Each agency shall further provide information by occupational category on all matters involving personnel evaluations, discipline or other reductions in workforce.	Evidence	Yes	Analysis (Data Entry)	Yes	Used CHRO provided Form	Each agency shall undertake a comprehensive review of the employment activity during the reporting period to identify policies and practices that perpetuate or build in barriers to equal employment. Each agency shall perform the following analyses: (1) The agency shall conduct a separate analysis for any occupational category or position classification for which a separate availability base has been calculated and employment activity has occurred during the reporting period through hire, termination or other personnel activity. (2) Each agency shall further provide information by occupational category on all matters involving personnel evaluations, discipline or other reductions in workforce.	
46a-68-87 Identification of problem areas	a (n/a)	Where an occupational category, position classification within an occupational category employing a significant number of persons or position classification for which a separate availability base is calculated has experienced an increase or reduction in workforce the agency shall examine its personnel policies and practices to identify those nonquantifiable aspects of the employment process which may impede or prevent the full and fair participation of protected race and sex group members in the employment process. Where applicable, the agency shall address the following aspects of employment: (1) employment applications; (2) job qualifications; (3) recruitment practices; (4) personnel policies; (5) orientation; (6) training; (7) counseling; (8) discrimination complaint process; (9) evaluation; (10) layoffs; and (11) termination.	Evidence	Yes	Narrative (Upload/Typed)	Yes		Where an occupational category, position classification within an occupational category employing a significant number of persons or position classification for which a separate availability base is calculated the agency shall examine its personnel policies and practices to identify those nonquantifiable aspects of the employment process which may impede or prevent the full and fair participation of all protected race and sex group members in the employment process. The agency shall address the following aspects of employment and address problem areas in: (1) employment applications; (2) job qualifications; (3) recruitment practices; (4) personnel policies; (5) orientation; (6) training; (7) career development; (8) counseling; (9) discrimination complaint process; (10) personnel evaluation; (11) layoffs; and (12) termination.	
46a-68-87 Identification of problem areas	b	For each occupational category or job title examined in subsection (a) of this section, the plan shall list all non-quantifiable elements of the employment process that have been identified as a problem area.	Evidence	Yes	Narrative (Upload/Typed)	Yes		n/a	
46a-68-87 Identification of problem areas	c	Each agency shall examine all aspects of the employment process itemized in subsection (a) of this section to identify whether any employment policy or practice may impede or prevent the full and fair participation of individuals with disabilities and older persons in the workforce.	Evidence	Yes	Narrative (Upload/Typed)	Yes		n/a	
46a-68-88 Program goals	a	Where an agency has identified, under section 46a-68-87 of the Regulations of Connecticut State Agencies, any employment policy or practice having an adverse impact upon protected race and sex group members, individuals with disabilities or older persons, it shall develop and implement program goals.	Evidence	Yes	Narrative (Upload/Typed)	Yes		Where an agency has identified, under section 46a-68-87 of the Regulations of Connecticut State Agencies, any employment policy or practice having an adverse impact upon protected class members, it shall develop and implement program goals.	
46a-68-88 Program goals	b	Program goals shall be meaningful, measurable and reasonably attainable and shall be consistent with section 46a-68-92 of the Regulations of Connecticut State Agencies to ensure: (1) the promotion of equal opportunity and to achieve a workplace free of discrimination; (2) opportunities for all qualified applicants including underutilized groups; (3) the utilization of a fair and nondiscriminatory recruitment and selection process; and (4) that career development opportunities are available to all interested and qualified employees, including minorities and women.	None	Yes	n/a			Program goals shall be meaningful, measurable and reasonably attainable to ensure:(1) the promotion of equal opp	
46a-68-88 Program goals	c	Where the cooperation of another agency is essential to the implementation of a program goal, the agency shall keep a record of each instance of contact with the agency whose cooperation is requested and the outcome of the request.	Attestation	Yes			Select Yes/No. If "Yes", provide agency name.	None	
46a-68-88 Program goals	d	An agency may elect to set program goals or the Commission on Human Rights and Opportunities may require that program goals be set for any employment policy or practice having an adverse impact upon a race and sex group or for any protected group not covered by this section whether or not that policy or practice was identified as having an adverse impact pursuant to section 46a-68-87 of the Regulations of Connecticut State Agencies.			Recommended by CHRO to implement. Tied to the whole section. no individual action req.			An agency may elect to set program goals or the Commission on Human Rights and Opportunities may require that	

Section	Subsection	Current Regulation Verbiage	Action	Confirmed?	Sample Expected Item(s)	Confirmed	Additional Notes	Proposed Statement Change	Action (Proposed)
46a-68-75 Definitions	n/a	As used in sections 46a-68-75 to 46a-68-114, inclusive, of the Regulations of Connecticut State Agencies: (1) Adversely	None	Yes	n/a			As used in sections 46a-68-75 to 46a-68-114, inclusive, of the Regulations of Connecticut State Agencies: (1) Adversely	None
46a-68-89 Discrimination complaint process	a	The plan shall include a report on the system to process and resolve employee allegations of discrimination consistent with chapter 67 and 68 of the Connecticut General Statutes. Such system shall provide for the expeditious resolution of grievances to assure that legal options for filing complaints with enforcement agencies are not foreclosed. The discrimination complaint process shall include: (1) periodic training in counseling and grievance investigations for agency counselors; (2) confidential counseling and procedures for informal resolution at the agency level by the equal employment opportunity officer; (3) notice to employees that an agency discrimination complaint process is available; (4) a guarantee of non-retaliation for the exercise of rights granted pursuant to this section; (5) advisement of legal options to file complaints with the Commission on Human Rights and Opportunities; United States Equal Employment Opportunity Commission; United States Department of Labor, Wage and Hour Division; and any other agencies, state, federal or local, that enforce laws concerning discrimination in employment; and (6) time frames not exceeding ninety (90) days for filing, processing and resolution of such matters.	Evidence	Yes	Narrative (Upload/Typed)	Yes	Use CHRO provide form	The plan shall include a report on the system to process and resolve employee allegations of discrimination consistent with chapter 67 and 68 of the Connecticut General Statutes. Such system shall provide for the expeditious resolution of grievances to assure that legal options for filing complaints with enforcement agencies are not foreclosed. The discrimination complaint process shall include: (1) periodic training in counseling and grievance investigations for agency counselors; (2) confidential counseling and procedures for informal resolution at the agency level by the equal employment opportunity officer; (3) notice to employees that an agency discrimination complaint process is available; (4) a guarantee of non-retaliation for the exercise of rights granted pursuant to this section; (5) advisement of legal options to file complaints with the Commission on Human Rights and Opportunities; United States Equal Employment Opportunity Commission; United States Department of Labor, Wage and Hour Division; and any other agencies, state, federal or local, that enforce laws concerning discrimination in employment; and (6) time frames not exceeding one hundred and twenty (120) days for processing and resolution of such matters.	
46a-68-89 Discrimination complaint process	b	All records of grievances and dispositions thereof shall be maintained and reviewed on a regular basis by the equal employment opportunity officer to detect any patterns in the nature of the grievances. Records so retained shall be confidential except where disclosure is required by law.	None	Yes	n/a			None	
46a-68-89 Discrimination complaint process	c	The plan shall contain a summary of the matters alleged, the results thereof and the length of time required to resolve the grievance. The plan shall provide information on the number of such complaints, investigating agency, whether such matter is currently pending or the outcome thereof. All records relevant to employee grievances filed under this section shall be maintained by the agency for examination by the Commission on Human Rights and Opportunities staff.	Evidence	Yes	Narrative (Upload/Typed)	Yes	Use CHRO provide form	The plan shall contain a summary of the matters alleged, the results thereof and the length of time required to resolve the grievance. The plan shall provide information on the number of such complaints, investigating agency, whether such matter is currently pending or the outcome thereof. All records relevant to employee grievances filed under this section shall be maintained by the Commission on Human Rights and Opportunities staff. The summary shall contain information relating to all complaints active or closed during the reporting period.	
46a-68-90 Goal analysis	a	Each agency shall prepare a report on all activity undertaken to achieve the hiring, promotion, and program goals contained in the previous affirmative action plan and a probing self-analysis of the progress made toward those ends. If the analysis reveals additional problem areas or finds any current course of action ineffective, the agency shall undertake corrective action as set forth in section 46a-68-88 of the Regulations of Connecticut State Agencies.	Evidence	Yes	Report (Upload/Typed)	Yes		Each agency shall prepare a report on all activity undertaken to achieve the employment and program goals contained in the previous affirmative action plan and a probing self-analysis of the progress made toward those ends. If the analysis reveals additional problem areas or finds any current course of action ineffective, the agency shall undertake corrective action as set forth in section 46a-68-88 of the Regulations of Connecticut State Agencies.	
46a-68-90 Goal analysis	b	For each job search, the agency shall provide the race and gender of: (1) the total applicant pool; (2) the qualified applicant pool; and (3) the applicants interviewed.	Evidence	Yes	Narrative (Upload/Typed)	Yes		For each job search, the agency shall provide the race and gender of: (1) the total applicant pool; (2) the not qualified applicant pool; (3) the qualified applicant pool; (4) the applicants interviewed; and (5) the applicant hired or promoted.	
46a-68-90 Goal analysis	c	When a goal is met, the agency shall identify the applicant as a goal candidate. No other information is required.	Evidence	Yes	Narrative (Upload/Typed)	Yes		None	
46a-68-90 Goal analysis	d	Each unmet goal shall be accompanied by a narrative outlining the agency's good faith efforts to achieve that goal by explaining why each goal candidate was eliminated. Each unmet goal, by job search, shall be separately addressed by narrative and the discussion of each goal applicant shall be detailed and complete.	Evidence	Yes	Narrative (Upload/Typed)	Yes		None	
46a-68-91 Career mobility	a	All departments and agencies of state government shall, pursuant to section 4-61u of the Connecticut General Statutes, establish an effective program of career mobility as part of their affirmative action program, as required by section 46a-68 of the Connecticut General Statutes, for occupational groups, which shall include, but not be limited to, secretarial, clerical, supervisory clerical, semiskilled, crafts and trades, supervisory crafts and trades, custodial, supervisory custodial and laborers. All departments and agencies of state government shall provide, or make provision for, career counseling for such occupational groups.	Evidence	Yes	Narrative (Upload/Typed)	Yes		None	
46a-68-91 Career mobility	b	Each department and agency of state government shall establish an effective program of accommodation and entry level training of persons with disabilities. Such programs shall be part of department and agency affirmative action programs required by section 46a-68 of the Connecticut General Statutes.	None	Yes	n/a			None	
46a-68-92 Good faith efforts	a	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; (2) ensure that employees are aware of nondiscrimination policies and procedures; post policies in a visible location. (3) ensure that departmental processes, procedures, and systems are nondiscriminatory and free of bias; (4) evaluate supervisors for making good faith efforts in equal employment opportunity and affirmative action; document in performance appraisals; (5) ensure that reasonable accommodations are made for disabled employees; (6) take appropriate and timely action when there has been an allegation of sexual harassment; and, (7) provide training to employees to enhance their knowledge of non-discrimination.	None	Yes	n/a		I attest that this agency has demonstrated good faith efforts when it has engaged in the initiatives articulated in subsections (a) to (d), inclusive, of this section.	None	
46a-68-92 Good faith efforts	b	Developed recruitment strategies that ensure opportunities for all qualified applicants, including underutilized groups; (1) identify affirmative action placement goals for all job openings. (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.	None	Yes	n/a		Use language from 46a-68-92 Good	None	
46a-68-92 Good faith efforts	c	Ensured a fair and nondiscriminatory selection process; and (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 that reasonable accommodations are made 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.	None	Yes	n/a		Use language from 46a-68-92 Good	None	
46a-68-92 Good faith efforts	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.	None	Yes	n/a		Use language from 46a-68-92 Good	None	
46a-68-92 Good faith efforts	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.	None	Yes	n/a		I understand that nothing in this sec	None	
46a-68-92 Good faith efforts	f	n/a						Nothing in this section shall be construed to absolve an agency of its obligations to commit to good faith efforts in meeting the goals set pursuant	

Section	Subsection	Current Regulation Verbiage	Action	Confirmed?	Sample Expected Item(s)	Confirmed	Additional Notes	Proposed Statement Change	Action (Proposed)
46a-68-75 Definitions	n/a	As used in sections 46a-68-75 to 46a-68-114, inclusive, of the Regulations of Connecticut State Agencies:(1)	None	Yes	n/a			As used in sections 46a-68-75 to 46a-68-114, inclusive, of the Regulations of Connecticut State Agencies:(1)Advers	None
46a-68-93 Innovative programs	a	The development and implementation of programs not covered elsewhere in the plan is an important part of the road to equal employment opportunity. Accordingly, within the framework of the affirmative action plan is an open invitation to each agency to structure comprehensive programs to create opportunities not otherwise available to achieve the full and fair participation of all protected group members. Such programs may include, but are not limited to: (1) summer employment programs; (2) youth programs; (3) apprenticeships; (4) work-study programs; (5) job sharing arrangements; (6) internships; (7) day care programs; (8) creation of new positions; (9) outreach for high school and college students; (10) reassignments; or (11) any positive, result-oriented program designed to achieve affirmative action.	Evidence	Yes	Narrative (Upload/Typed)	Yes		The development and implementation of programs not covered elsewhere in the plan is an important part of the road to equal employment opportunity. Accordingly, within the framework of the affirmative action plan is an open invitation to each agency to structure comprehensive programs to create opportunities not otherwise available to achieve the full and fair participation of all protected group members.	
46a-68-93 Innovative programs	b	The plan shall describe any program planned or operated pursuant to this section and report the results achieved.	Evidence	Yes	Narrative (Upload/Typed)	Yes		The plan shall describe any positive, result-oriented program designed to achieve affirmative action planned or operated pursuant to this section and report the results achieved.	
46a-68-94 Concluding statement	a	The affirmative action plan shall contain a concluding statement that: (1) acknowledges that the ultimate responsibility for promoting and enforcing affirmative action rests with the appointing authority, who shall account for the success or failure of the plan; (2) acknowledges that every good faith effort to achieve the objectives and goals set forth in the plan has been made; and (3) attests that the agency's equal employment opportunity officer reports directly to the agency head.	Evidence	Yes	Signed Statement (Upload/Typed)	Yes		None	
46a-68-94 Concluding statement	b	The concluding statement shall be signed and dated by the appointing authority.	Evidence	Yes	Signature	Yes		None	



State of Connecticut COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

450 Columbus Boulevard, Suite 2, Hartford, CT 06103

Promoting Equality and Justice for all People

Commission on Human Rights and Opportunities' Responses and Comments on the Streamlining Affirmative Action Plans Recommendation Revised Final Report

The Commission on Human Rights and Opportunities (CHRO) is tasked with eliminating discrimination throughout the State of Connecticut. One of its most effective tools in doing so is through its oversight of the State's Affirmative Action Program. This program monitors equal employment throughout state hiring to ensure Connecticut's workforce can ensure the most qualified applicants are hired, regardless of their race or sex.

Over the past year, the CHRO has worked with other stakeholders in putting together recommendations to streamline that process. The outcome of this effort is a report dated January 5, 2024 that was issued by the Office of Policy and Management. The Commission commends everyone whose efforts contributed to this report for their diligence and thoughtful feedback. In particular, the Commission wants to thank the report's principle drafter, Augusta Irechukwu, for her efforts.

Following comments on the final report from the Commission, revisions were made. These revisions go far in addressing the concerns the Commission had with some of the recommendations. As there are still areas of disagreement and, in order to make the Commission's position on the recommendations clear, the Commission provides the following commentary on the revisions.

Comments on Recommendations

As an initial, general point, it is important to emphasize that the Commission operates under significant resource constraints. Many of the recommendations call for the creation of additional training resources or materials meant to aid state agencies through the process of drafting an affirmative action plan. The Commission currently has two full-time staff members working in the unit with an additional part-time staff member assisting as time allows. Despite this small team, the unit was able to review over thirty state agency affirmative action plans over the last fiscal year and gave 237 technical assistance sessions to work with state agencies in how to draft their report. The unit has worked as part of a taskforce to meet with EEO professionals throughout the state to answer their questions and ensure the process maximizes the state's affirmative action efforts. This is a tremendous amount of work resulting in not only the timely review of affirmative action plans, but the provision of training and resources to every state agency. Given that workload, the Commission cannot enact many of the recommendations in the report without the allocation of additional resources on a permanent basis.

The revisions to the report acknowledge this. In particular, the report notes that there is limited funding already allocated towards updating the affirmative action program. While this allocation

is crucial, it will likely not be enough. A system capable of achieving the results outlined in the report will likely exceed the appropriated funding. If a robust system capable of meaningful efficiencies is to be developed, there must be a strong funding commitment from the State. Moreover, any such system will require a permanent budget item for the service of such a program. Without a service contract, any system that is created will not be sustainable in the long run. Therefore it is crucial to emphasize that the allocated funding is a start but only a start and more, long-term funding will be required to implement the recommendations of the report.

With respect to the numbered recommendations, the Commission provides the following comment:

1. Implement an Online Application Platform

The Commission fully supports the creation of an online application for the creation of affirmative action plans. During the process of researching this report, the Commission was able to review applications in use in other jurisdictions. While these examples provided streamlined means for the submission of plans, none of the examples were suitable for the creation of plans. This means that a solution will require either creation of a new program or else heavy modification of an existing program in order to meet the requirements of Connecticut. As such, the Commission is excited to work with vendors to build a platform to streamline the affirmative action process while prioritizing the program's goal of ensuring equal opportunity throughout state employment.

2. Developing CHRO Approved Templates

This recommendation focuses on the creation of Excel workbooks for use by EEO professionals as an interim measure while an online application is built. This is again a recommendation the Commission fully supports. The Commission is glad that OPM has already begun work on these workbooks and is excited to test them vigorously. It will be essential for CHRO staff to be familiar with how these workbooks function, to know what their limitations are, and to be able to identify any issues attributed to the workbook that might be present in the submitted plans.

3. Developing STARS Queries to Extract Data

This recommendation is directed more at the Office of Policy and Management and the creation of additional queries to be used by EEO staff. The Commission supports this endeavor and any other measures aimed at providing up-to-date data to EEO professionals in putting together affirmative action plans.

4. Improving Core-CT Data Quality

This recommendation has seen significant revision from its original content which has addressed many of the Commission's concerns. In particular, the emphasis on supporting an individual's right to self-identification is greatly appreciated. While data integrity must be a concern in gathering demographic information, there must always be a recognition that how or whether a person identifies is a deeply personal choice that cannot be made by another. What may look like an misidentification or a data gap could be a profound part of a person's identity. With the revisions

to the report, the Commission supports working with OPM, DAS, and other stakeholders to create a system that gathers the necessary information in a respectful and appropriate manner.

5. Enhancing Training and Resources Available for EEO Officers

The Commission fully supports this recommendation with the reminder once again that creating additional training resources is a matter of agency resources. Without additional staff and support, the Commission is limited in how many materials it can make available to EEO staff.

6. Providing Improved Access to Standard Census Data

The Commission fully supports this recommendation. While outside the control of the CHRO, the creation of standardized data tools would be an asset to EEO professionals throughout the state.

7. Ensure EEO Officers have access to Applicant Data for Goals Analysis

The Commission is not involved with access to data sources in other agencies. To the extent that data can be provided to EEO professionals without compromising any confidential information, the Commission supports this recommendation.

8. Ensure Consistent Demographic Categories Across Connecticut Data Systems

The Commission supports this recommendation and its revisions to note that demographic categories are far more than a technical matter. They are a sociological one with profound implications for where lines are drawn. Ensuring categories are consistent not only with one another and other data sources but with how each community identifies is crucial. The Commission is excited to work with a multi-disciplinary group dedicated to getting these categories right amidst many competing considerations.

9. Review Reporting and Correction Timeline After Automation

The Commission supports this recommendation to the extent that consideration of changes only occurs after implementation of the earlier ones. There are many factors that impact an agency's ability to submit thorough and complete affirmative action plans on time. With the efficiencies put in place with a new system, hopefully many of the delays and revisions the Commission currently sees will be reduced and the cause any additional delays or need for multiple revisions will be able to be addressed as precisely as possible.

10. Reduce Agency Burden by Increasing Threshold for Availability Analysis

Finally, the report recommends increasing the threshold for availability analyses from positions with 25 or more employees to only those with 100 or more employees. Doing so would reduce the number of analyses from 298 to 64. While the Commission supports reducing unnecessary reporting, not all reporting is unnecessary. Availability analyses are at the core of an affirmative

action plan and allow for agencies to establish goals for occupations with meaningful specificity. When doing an availability analysis, agencies are required to look at how that position is currently staffed and compare that to the makeup of that specific labor market. When that specificity is lost, so too is the value of that analysis. You cannot address what you cannot see and many positions where we see marked disparities in employment would go without consideration if the threshold is set too high.

For that reason, the Commission recommends raising the threshold to 30 or more employees per analyzed position. This would reduce the amount of separate reports by fifty while ensuring that the workforce is analyzed with sufficiently useful specificity.

In revisions to the report, there is a recommendation for the Commission to consider a mechanism for agencies to forgo analysis of certain positions if certain criteria are met. While there are foreseeable issues with such an approach such as losing oversight that could then lead to new issues arising, the Commission is open to working with agencies to come to a process that achieves the goals of the program while eliminating any truly unnecessary reporting requirements.