

U.S. Department of Justice

Office of Justice Programs

Office for Civil Rights

Washington, D.C. 20531

April 21, 2017

Benjamin Barnes Secretary Connecticut Office of Policy and Management 450 Capitol Avenue Hartford, CT 06106

Re: Equal Employment Opportunity Plan (EEOP) Utilization Report for Connecticut Office of Policy and Management

Dear Mr. Barnes,

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

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

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

Sincerely,

Michael L. Alston

Director

Signed by: MICHAEL ALSTON

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EEO Utilization Report

Organization Information

Name: Connecticut Office Of Policy And Management

City: Hartford

State: CT

Zip: 06106

Type: State Government (not law enforcement)

Step 1: Introductory Information

Policy Statement:

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

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

Step 4b: Narrative of Interpretation

A review of the Utilization Analysis (comparing the agencys workforce to the relevant labor market) reflects the following:

- 1. White females were significantly under-represented in the following job category: Officials/Administrators (-18%). Our agency finds, after reviewing our hiring for approximately the past five and three-quarter (5.75) years that there was not a significant amount of interest by White females in Official/Administrator vacancies (only 15% of the applicants were qualified White females). During the past five (5) plus years there were eleven (11) hires in the Officials/Administrators category and two (2) of the eleven (11) hires were White females, who were both promoted from within the agency.
- 2. White males were significantly under-represented in the following job categories: Professionals (-7%) and Administrative Support (-16%). Significant process has been made since the 2015 report in increasing the representation of White males in the Professional category. The under-representation declined from 12% to 7%, a 41.7% decrease. Despite this improvement, White males are still under-represented by 7% in the Professionals category. Our agency finds after reviewing our hiring for approximately the past five and three-quarter (5.75) years that although only 22% of applicants for Professional vacancies were White males, 36% of the hires and promotions into the Professionals category were White males. Regarding the Administrative Support category, the under-representation is due to a lack of interest in Administrative Support vacancies by White males (only 4% of the applicants were qualified White males).

See Attached for the complete narrative.

Following File has been uploaded: Step 4b of 7 - Narrative of Interpretation attachment.pdf

Step 5: Objectives and Steps

- 1. OPM is committed to making its workforce more representative of the labor market in the community. Based on the results of the under-utilization analysis, OPM has established the following objectives. To address the largest areas of under-utilization, it is a goal of OPM to increase representation of White females in the Officials/Administrators category and White males in the Professionals and Administrative Support categories.
 - a. Intensify recruitment efforts to attract underrepresented groups in OPMs workforce as applicants. Some examples of this include the posting of job announcements on OPMs website as well as the Department of Administrative Services website, which posts job opportunities for the State of Connecticut; OPMs recent partnering with the Department of Labor and utilizing their website to post all job announcements that are open to the public; and contacting resources directly via standard mail and email of all job announcements that are open to the public. OPMs recruitment resource list contains seventy-five statewide organizations including the Urban League, the Commission on Equity and Opportunity, local colleges and universities, Community Action agencies, Womens Centers across the State, and the Connecticut Association of Diversity Professionals. The agency also places a print ad in the Northeast News (a local minority newspaper) for each recruitment that is open to the public.
 - b. Review job specifications to assure that they accurately reflect the duties and responsibilities of the job to ensure there are no barriers or adverse impact to both current employees and potential applicants.
 - c. Provide all OPM staff, via agency-wide email, with information about internal job vacancies and statewide examinations.
 - d. For each examined job classification used in the recruitment process, review the pass/fail results of job examinations in an effort to ensure there are no barriers or adverse impact to both current employees seeking promotional opportunities and potential applicants, and if necessary, request the Department of Administrative Services (the agency responsible for administering statewide exams) review the validity of examinations.
 - e. Monitor & guide the agencys hiring process to determine the viability of its procedures as well as ensure there are no barriers or adverse impact to both current staff seeking promotional opportunities and to job applicants. The Designated EEO Officer provides training to search committees to minimize biases such as; requiring the search committee to provide the preferred tangible skills before the employment search begins; working w/ the search committee to reach a vast group of relevant recruitment sources to obtain the most diverse & qualified applicant pool possible; instruct how to select candidates for interviews based upon the pre-determined criteria; require that the

interview questions are pre-approved by the Designated EEO Officer before the interviews begin to ensure questions being asked are appropriate, consistent, & do not provide an opportunity to allow for any bias in the decision making process; & work w/ the search committee to select a diverse interview panel.

- f. Maintain increased involvement of the designated Equal Employment Opportunity Officer / Human Resources representative in the applicant flow process i.e., review résumé/application packages and make recommendations for qualified candidates to be interviewed.
- g. Continue to reach out to underutilized groups on the employment and re-employment lists.
- 2. To further address the under-utilization of minorities, it is a goal of OPM to increase the representation of Black or African American males and females in the Officials/Administrators category and Hispanic or Latino males in the Administrative Support category.
 - a. Provide all OPM staff, via agency-wide email, with information about internal job vacancies and statewide examinations
 - b. Intensify recruitment efforts to attract underrepresented groups in OPMs workforce as applicants. Some examples of this include posting jobs on OPMs website and the Department of Administrative Services website (which posts job opportunities for the State of CT). When opportunities arise for open recruitment, announce jobs in minority news outlets, post all job announcements that are open to the public on the Department of Labors website; contacting resources directly via standard mail and email of all job announcements that are open to the public. OPMs recruitment resource list contains seventy-five statewide organizations including the NAACP, Urban League, the Commission on Equity and Opportunity, local colleges and universities, Community Action agencies, Womens Centers across the State, and the CT Association of Diversity Professionals. The agency also places a print ad in the Northeast News (a local minority newspaper) for each recruitment that is open to the public.
 - c. Continue contacts with organizations such as the NAACP, the Urban League and the Commission on Equity and Opportunity, in an effort to cultivate a successful outreach recruitment program.
 - d. Review job specifications to assure that they accurately reflect the duties and responsibilities of the job to ensure there are no barriers or adverse impact to both current employees and potential applicants.
 - e. Monitor & guide the agencys hiring process to determine the viability of its procedures as well as ensure there are no barriers or adverse impact to both current staff seeking promotional opportunities and to job applicants. The Designated EEO Officer provides training to search committees to minimize biases such as; requiring the search committee to provide the preferred tangible skills before the employment search begins; working w/ the search committee to reach a vast group of relevant recruitment sources to obtain the most diverse & qualified applicant pool possible; instruct how to select candidates for interviews based upon the pre-determined criteria; require that the interview questions are pre-approved by the Designated EEO Officer before the interviews begin to ensure questions being asked are appropriate, consistent, & do not provide an opportunity to allow for any bias in the decision making process: & work w/ the search committee to select a diverse interview panel.
 - f. Monitor and guide the agencys interview hiring process to determine the viability of its procedures.
 - g. Maintain increased involvement of the designated Equal Employment Opportunity Officer / Human Resources representative in the applicant flow process i.e., review résumé/application packages and make recommendations for qualified candidates to be interviewed.
 - h. Continue to reach out to underutilized groups on the employment and/or re-employment lists.

Step 6: Internal Dissemination

- a. Continue to post in a central location and make available to all employees via the agencys Intranet the agencys Equal Employment Opportunity Plan Utilization Report approved by the US Department of Justice, the agencys Affirmative Action policy statements, complaint procedure and annual hiring, promotion and program objectives.
- b. Continue to advise all employees of their right to review the agencys Affirmative Action Plan and to encourage them to submit written comments. Employees are provided an electronic copy via email of the Affirmative Action Plan and the Equal Employment Opportunity Plan Utilization Report approved by the US Department of Justice. Hard copies of both the Equal Employment Opportunity Plan Utilization Report approved by the US Department of Justice and the Affirmative Action Plan are available in the Human Resources / Equal Employment Opportunity Office and is posted on the agencys Intranet.
- c. Continue to provide information to staff about job vacancies, whether internal or external, via email and posting on the

agencys Intranet.

- d. Continue to provide the Secretary, Deputy Secretary, Division Heads, and key personnel with a monthly report assessing the agencys achievement of objectives and other relevant information regarding Affirmative Action.
- e. Advise all employees of their right to review the Equal Employment Opportunity Plan Utilization Report and to encourage them to submit written comments.
- f. Provide hard copy of the Equal Employment Opportunity Plan Utilization Report approved by the US Department of Justice to staff upon request.

Step 7: External Dissemination

- a. Continue expanded recruitment practices including targeted news media & professional journals, & one-on-one communication w/ representatives of the NAACP, the Urban League & the Commission on Equity & Opportunity to cultivate a successful outreach program.
- b. Continue to update the agencys listing of minority recruitment resources.
- c. Continue to provide a copy of OPMs Affirmative Action (AA) Plan to unions which represent OPMs employees & invite such unions to review & comment on the agencys AA Plan.
- d. Continue to include the statement OPM is an Equal Opportunity Employer on all job applications, job announcements & envelopes.
- e. Continue to make the EEO Plan Utilization Report approved by the US DOJ available to the public, including vendors & contractors, by posting such Report on OPMs Internet (in the About Us & Programs & Services Sections) & include statements online that a hard copy of the report will be made available upon request by the Designated EEO Officer.
- f. Provide a hard copy of the EEO Plan Utilization Report approved by the US DOJ to members of the public, including contractors & vendors, upon request.
- h. Continue to include nondiscrimination & AA provisions in its contracts, in accordance w/ Connecticut General Statutes Sections 4a-60 & 4a-60a. Continue to notice grantees (& all of their sub grantees) who receive federal funds that they will comply w/ the nondiscrimination requirement of Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973 as amended; & the Age Discrimination Act of 1975, to the effect that no person shall, on the grounds of race, color, national origin, age, sex, or disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under, or denied employment in connection w/ any program or activity funded in whole or in part w/ funds made available in said grant.

Utilization Analysis Chart

Relevant Labor Market: Hartford County, Connecticut

		Male Female														
Job Categories	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other
Officials/Administrators		T	T	Г					1	Т	Г	T	Г			T
Workforce #/%	15/68%	1/5%	0/0%	0/0%	2/9%	0/0%	0/0%	0/0%	4/18%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
CLS #/%	35,580/49 %	1,455/2%	1,810/3%	10/0%	1,950/3%	0/0%	190/0%	155/0%	25,990/36 %	1,545/2%	2,215/3%	50/0%	875/1%	20/0%	200/0%	185/0%
Utilization #/%	19%	3%	-3%	-0%	6%	0%	-0%	-0%	-18%	-2%	-3%	-0%	-1%	-0%	-0%	-0%
Professionals																
Workforce #/%	17/31%	1/2%	1/2%	0/0%	2/4%	0/0%	0/0%	0/0%	24/44%	3/5%	6/11%	0/0%	1/2%	0/0%	0/0%	0/0%
CLS #/%	41,970/38 %	2,100/2%	3,405/3%	55/0%	3,815/3%	0/0%	400/0%	355/0%	47,995/43 %	2,745/2%	4,430/4%	25/0%	2,445/2%	0/0%	525/0%	180/0%
Utilization #/%	-7%	-0%	-1%	-0%	0%	0%	-0%	-0%	0%	3%	7%	-0%	-0%	0%	-0%	-0%
Technicians																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	6,000/38 %	525/3%	380/2%	40/0%	645/4%	0/0%	20/0%	10/0%	6,295/40 %	535/3%	875/5%	10/0%	485/3%	45/0%	48/0%	10/0%
Utilization #/%																
Protective Services: Sworn																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	5,185/61 %	865/10%	945/11%	0/0%	50/1%	0/0%	49/1%	10/0%	755/9%	320/4%	355/4%	25/0%	0/0%	0/0%	0/0%	4/0%
Utilization #/%																
Protective Services: Non- sworn																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
Civilian Labor Force #/%	495/46%	24/2%	40/4%	0/0%	0/0%	0/0%	15/1%	0/0%	380/35%	20/2%	100/9%	0/0%	0/0%	0/0%	0/0%	10/1%
Utilization #/%																
Administrative Support					,									,,		
Workforce #/%	2/12%	0/0%	1/6%	0/0%	0/0%	0/0%	0/0%	0/0%	8/47%	2/12%	4/24%	0/0%	0/0%	0/0%	0/0%	0/0%
CLS #/%	38,510/28	4,115/3%	5,425/4%	160/0%	1,520/1%	0/0%	335/0%	280/0%	65,185/47	9,975/7%	10,325/7	115/0%	1,925/1%	30/0%	720/1%	370/0%

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	Male								Female							
Job Categories	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other
	%								%		%					
Utilization #/%	-16%	-3%	2%	-0%	-1%	0%	-0%	-0%	0%	5%	16%	-0%	-1%	-0%	-1%	-0%
Skilled Craft																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	28,750/76 %	3,710/10 %	1,985/5%	20/0%	620/2%	0/0%	420/1%	160/0%	1,495/4%	290/1%	225/1%	0/0%	115/0%	0/0%	0/0%	0/0%
Utilization #/%																
Service/Maintenance																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	41,450/36 %	12,850/11 %	8,300/7%	90/0%	1,950/2%	15/0%	275/0%	405/0%	28,805/25 %	10,070/9 %	7,995/7%	40/0%	1,785/2%	65/0%	520/0%	485/0%
Utilization #/%																

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

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

Certified As Final By: Benjamin Barnes	Secretary	04-14-2017	
[signature]	[title]	[date]	

Step 4b of 7: Narrative of Interpretation

A review of the Utilization Analysis (comparing the agency's workforce to the relevant labor market) reflects the following:

- 1. White females were significantly under-represented in the following job category: Officials/Administrators (-18%). Our agency finds, after reviewing our hiring for approximately the past five and three-quarter (5.75) years that there was not a significant amount of interest by White females in Official/Administrator vacancies (only 15% of the applicants were qualified White females). During the past five (5) plus years there were eleven (11) hires in the Officials/Administrators category and two (2) of the eleven (11) hires were White females, who were both promoted from within the agency.
- 2. White males were significantly under-represented in the following job categories: Professionals (-7%) and Administrative Support (-16%). Significant process has been made since the 2015 report in increasing the representation of White males in the Professional category. The under-representation declined from 12% to 7%, a 41.7% decrease. Despite this improvement, White males are still under-represented by 7% in the Professionals category. Our agency finds after reviewing our hiring for approximately the past five and three-quarter (5.75) years that although only 22% of applicants for Professional vacancies were White males, 36% of the hires and promotions into the Professionals category were White males. Regarding the Administrative Support category, the under-representation is due to a lack of interest in Administrative Support vacancies by White males (only 4% of the applicants were qualified White males).
- 3. Black or African American males and females were not represented in the Officials/Administrators category. In comparison to the relevant labor market the underrepresentation for both Black or African American males and females was (-3%) respectively. Our agency finds, after reviewing our hiring for approximately the past five and three-quarter (5.75) years that there was a lack of interest by both Black or African American males and females in Official/Administrator vacancies (only 3% of the applicants were qualified Black or African American males and females, respectively).
- 4. Hispanic males were not represented in the Administrative Support category. In comparison to the relevant labor market the under-representation was (-3%). Our agency finds, after reviewing our hiring for approximately the past five and three-quarter (5.75) years that there was a lack of interest in Administrative Support vacancies by Hispanic males (only 1% of the applicants were qualified Hispanic males).
- 5. The agency is committed to equal employment opportunities and having a workforce representative of the labor market in the community. We will continue to review our recruitment practices in an effort to reach this goal and to also diversify our workforce.