

# U.S. Department of Justice

# Office of Justice Programs

Office for Civil Rights

Washington, D.C. 20531

June 7, 2019

Carolyn Kozak
Principal Human Resources Spec
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 Ms. Kozak,

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

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

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

Sincerely,

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

Step 4b of 7: 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 categories: Administrative Support (11%) and Officials/Administrators (8%). Previously White females were under-represented by 18% in the Officials/Administrators job category and by 0% in the Administrative Support category. There has been significant progress in the representation of White females in the Officials/Administrators category since the 2017 report. The under-representation declined from 18% to 8%. However, in the Administrative support job category there has been a significant increase in under-representation of White females since the 2017 report from 0% to 11%. This increase in under-representation reflects a net decrease in the number of Administrative Support staff due to fiscal constraints (from a total of seventeen (17) in 2017 to a total of thirteen (13) in 2019, of which three (3) were white females).

2. White males were significantly under-represented in the Administrative Support job category by 20%. This is an increase from the 2017 report of 16%. Similar to the increase in under-representation of White Females in the Administrative Support category, the increase in under-representation reflects a net decrease in the number of Administrative Support staff due to fiscal constraints (from a total of seventeen (17) in 2017 to a total of thirteen (13) in 2019, of which one (1) was a white male).

Significant process has been made since the 2017 report in increasing the representation of White males in the Professional category. The under-representation declined from 7% to 2%, a 71.43% decrease.

See attached for the complete narrative.

Following File has been uploaded: Step 4b of 7 - Narrative of Interpretation attachment - 2019.docx

#### 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 both the Officials/Administrators and Administrative Support categories and White males in the Administrative Support category.
  - 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; continue to partner with the Dept. of Labor utilizing their website to post all job announcements that are open to the public; during this reporting period we have begun to post job announcements on the States new online employment center, JobAps, through the Department of Administrative Services website, which posts job opportunities for the State of CT on the States website as well as on Twitter, Indeed. Facebook & Pinterest; & contacting resources directly via email of all job announcements that are open to the public. OPMs recruitment resource tist contains eighty-two (82) statewide organizations including local Urban Leagues, the Commission on Equity & Opportunity, local colleges/universities, Community Action agencies, Womens Centers across the State, & the CT Association of Diversity Professionals.
  - 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.
  - d. Monitor & guide the agencys hiring process to det. the viability of its procedures & ensure there are no barriers or adverse impact to both current staff seeking promotional opportunities & to job applicants. The EEO Officer provides training to search committees to minimize biases such as; requiring to the identify the preferred tangible skills before the employment search begins; work 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; req. interview questions are pre-approved by the 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; & proctors all 1st round interviews to ensure they are consistent & unbiased.

- e. Maintain increased involvement of the Designated EEO Officer / Human Resources representative in the applicant flow process i.e., review résumé/application packages and make recommendations for qualified candidates to be interviewed.
- f. 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 and Hispanic or Latino females in the Officials/Administrators category, Asian males in the Professionals 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.
  - b. Intensify recruitment efforts to attract underrepresented groups in OPMs workforce as applicants. Some examples are: post jobs on OPMs website, during this reporting period posted jobs on the States new online employment center, JobAps, through the Dept. of Admin. Services, which posts jobs for the State of CT on the States website as well as on Twitter, Indeed, Facebook & Pinterest. When opportunities arise for open recruitment, post all job announcements on DOLs site; contacting resources directly via email of all job announcements that are open to the public. OPMs recruitment resource list contains eighty-two (82) statewide organizations including the NAACP, local Urban Leagues, the Commission on Equity & Opportunity, local colleges/universities, Community Action agencies, Womens Centers across CT, the Asian American Business Association, the Latino & Puerto Rican Affairs Community & the CT Association of Diversity Professionals, & place a print ad in a local minority newspaper.
  - c. Review job specifications to assure that they accurately reflect the duties and responsibilities of the job to ensure there are no barriers or adverse impact to both current employees and potential applicants.
  - d. Continue contacts with organizations such as the NAACP, the Urban League and the Commission on Equity and Opportunity, in an effort to cultivate a successful outreach recruitment program.
- e. 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 & to job applicants. The Designated EEO Officer provides training to search committees to minimize biases such as; requiring the search committee to identify the preferred tangible skills before the employment search begins; work 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 interview questions are pre-approved by the Designated EEO Officer prior to the interview to ensure questions 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; & proctor all first round interviews.
- f. Monitor and guide the agencys interview hiring process to determine the viability of its procedures.
- g. Maintain increased involvement of the Designated EEO Officer / Human Resources representative in the applicant flow process i.e., review résumé/application packages and make recommendations for qualified candidates to be interviewed.
- 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 are 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. Conlinue 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, Urban League & 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 Plan to unions which represent OPMs employees & invite such unions to review & comment on the agencys Plan.
- d. Continue to include the statement OPM is an Equal Opportunity Employer on all job applications, job announcements & envelopes.
- e. Continue to make the Equal Employment Opportunity Plan Utilization Report (EEOP) approved by the US DOJ available to the public, including vendors & contractors, by posting such Report on OPMs Internet (in the About OPM Section with our Division Links section) & include statements online that a hard copy of the report will be made available upon request by the Designated EEO Officer.
- f. Provide hard copy of the EEOP approved by the US DOJ to members of the public, including contractors & vendors, upon request.
- g. Continue to include nondiscrimination & affirmative action provisions in its contracts, in accordance w/ CT General Statutes Sections 4a-60 & 4a-60a. Continue to notice grantees (& all of their sub grantees) who rec. fed. funds that they will comply w/ the nondiscrimination requirement of Title VI of the Civil Rights Act of 1964;Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973 as amended;&Title II of the Americans with Disabilities Act of 1990, to the effect that no person shall, on the grounds of race, color, national origin, age, sex, or disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under, or denied employment in connection w/ any program or activity funded in whole or in part w/ funds made available in said grant.

Utilization Analysis Chart Refevant Labor Market: Connecticut

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				Male	He					-		Female	ale			
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%/# \$70	119,050/5	119,050/5 5,590/2% 5,360/2% 2%	5,360/2%	110/0%	5.830/3%	%0/0	%0/089	465/0%	78,985/34 4.800/2%		5,495/2%		3,235/1%	%0/09	725/0%	\$20/0%
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CLS#%	135,175/3 7%	135,175/3 6,860/2% 9,190/2% 7%	9.190/2%	180/0%	12,835/3	%0/0	1,045/0%		166,995/4		12,755/3	1.0	9.590/3%	1	1.520/0%	745/0%
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				Male	je e							Female	ale			
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				Native		Pacific Islander						Native		Pacific Islander		
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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.

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(signature)	[title]	0	(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 categories: Administrative Support (11%) and Officials/Administrators (8%). Previously White females were under-represented by 18% in the Officials/Administrators job category and by 0% in the Administrative Support category. There has been significant progress in the representation of White females in the Officials/Administrators category since the 2017 report. The under-representation declined from 18% to 8%. However, in the Administrative support job category there has been a significant increase in under-representation of White females since the 2017 report from 0% to 11%. This increase in under-representation reflects a net decrease in the number of Administrative Support staff due to fiscal constraints (from a total of seventeen (17) in 2017 to a total of thirteen (13) in 2019, of which three (3) were white females).
- 2. White males were significantly under-represented in the Administrative Support job category by 20%. This is an increase from the 2017 report of 16%. Similar to the increase in under-representation of White Females in the Administrative Support category, the increase in under-representation reflects a net decrease in the number of Administrative Support staff due to fiscal constraints (from a total of seventeen (17) in 2017 to a total of thirteen (13) in 2019, of which one (1) was a white male).
  Significant process has been made since the 2017 report in increasing the representation of
  - Significant process has been made since the 2017 report in increasing the representation of White males in the Professional category. The under-representation declined from 7% to 2%, a 71.43% decrease.
- 3. Black or African American males and females continue to not be 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 2%. There continues to be limited opportunities for hiring in the Officials/Administrators category. In reviewing our hires for the past five (5) years, there were only seven (7) hires or promotions in the Officials/Administrators category. During this five (5) year time period, there was a lack of interest by both Black or African American males and females in Official/Administrator vacancies (i.e., only 3% of the applicants were qualified Black or African American males and 0% of the applicants were qualified Black or African American females).
- 4. Hispanic or Latino 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 the past five (5) years that there was a lack of interest in Administrative Support vacancies by Hispanic or Latino males (only 1% of the applicants were qualified Hispanic or Latino males). There has been no change in these numbers since the 2017 report where the under-representation of Hispanic or Latino males was 3% with Hispanic or Latino males representing only 1% of the qualified applicants.
- 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.