

AFFIRMATIVE ACTION PROGRAM

FOR

Charter Oak State College

Edward Klonoski

President, Charter Oak State College

**For the Reporting Period:
December 1, 2022 – November 30, 2024**

Submitted: March 2025

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March 2025

Tanya Hughes
Executive Director
Commission on Human Rights
450 Columbus Blvd, Suite 2
Hartford, CT 06103

Dear Executive Director Hughes:

The Charter Oak State College has prepared the Affirmative Action Plan in accordance with section 46a- 68 of the Connecticut General Statutes and Sections 46a-68-75 through 46a- 68-114 of the Commission on Human Rights and Opportunities Regulations.

Affirmative Action and Equal Employment Opportunity are the foundations of our higher education institutions. We firmly believe education is the gateway to undoing past practices of discrimination and building a workforce that reflects our diversity. The AA Plan reflects our efforts and commitment to equal opportunity, equity, and justice.

The plan sets forth necessary goals and objectives for the College to achieve parity with relevant labor markets and will serve as a guide in our efforts to eliminate barriers in employment processes. It further asserts our commitment to prohibiting discrimination as defined by Connecticut and Federal laws and regulations.

I am committed to the future achievements of this Affirmative Action Plan and the achievement of our programs and goals set forth herein.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed Klonoski".

President Ed Klonoski
Charter Oak State College



State of Connecticut
Commission on Human Rights and Opportunities

Central Office – 450 Columbus Blvd Ste 2, Hartford CT 06103

Promoting Equality and Justice for all People

SENT VIA EMAIL

June 22, 2023

Edward D. Klonoski, President
Charter Oak State College
55 Paul Manafort Dr
New Britain, CT 06053

RE: 2023 Affirmative Action Plan - APPROVED

Dear President Klonoski:

Pursuant to Section 46a-68(d) of the general statutes, the Commission on Human Rights and Opportunities has reviewed the proposed affirmative action plan submitted by Charter Oak State College on March 30, 2023. The Commission at its regular meeting on June 14, 2023, voted that the plan be **APPROVED**.

The review and analysis of the proposed affirmative action plan was performed in accordance with Section 46a-68-103 and is transmitted herewith. **THE SCHEDULED DATE FOR YOUR NEXT FILING is March 30, 2025.**

The Commission requests that the attached evaluation be thoroughly reviewed to ensure that all deficiencies, omissions, and errors identified in the Evaluation be addressed.

For technical assistance or if you have any questions you may contact Gary Madison, HRO Representative at 860-541-3411.

Sincerely,

Tanya A. Hughes
Executive Director

Attachment

C: Nicholas D'Agostino, Director of Equal Employment Opportunity
Rebecca Cannon-Klemenzen, Equal Employment Opportunity Specialist
Neva Elaine Vigezzi, Supervisor, Affirmative Action Unit
Gary Madison, HRO Representative



State of Connecticut Commission on Human Rights and Opportunities

Central Office – 450 Columbus Blvd Ste 2, Hartford CT 06103

Promoting Equality and Justice for all People

PROPOSED AFFIRMATIVE ACTION PLAN

Charter Oak State College AGENCY

REVIEW AND ANALYSIS: A COMPARATIVE EVALUATION

INTRODUCTION

SECTION 46a-68-102. STANDARD OF REVIEW

- (a) To receive approved status, a plan must contain all elements required by Sections 46a-68-78 through 46a-68-94, inclusive.
- (b) Additionally, a plan shall be approved only if:
 - (1) the work force, considered as a whole and by occupational category, is in parity; or
 - (2) the agency has met all or substantially all of its hiring, promotion and program goals during the reporting period; or
 - (3) the agency has demonstrated every good faith effort to achieve such goals and, despite these efforts, has been unable to do so; and
 - (4) the agency has substantially addressed deficiencies noted by the Commission on Human Rights and Opportunities.

SECTION 46a-68-103. PLAN REVIEW AND ANALYSIS

As part of the review process, a written evaluation of the plan shall be prepared by Commission on Human Rights and Opportunities staff. Such evaluation shall:

1. assess the degree of procedural compliance with Regulations of CT State Agencies
2. identify and comment upon the deficiencies and weaknesses of the plan;
3. appraise the performance and effort of the agency in meeting its goals;
4. evaluate the effectiveness of the affirmative action program; and
5. suggest remedial action in addition to or in lieu of that proposed in the plan to achieve a balanced workforce and eliminate discriminatory practices.

Agency

SECTION 46a-68-78. Policy Statement

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-79. Internal Communication

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-80. External Communication and Recruitment Strategies

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-81. Assignment of Responsibility and Monitoring

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

Agency

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-82. Organizational Analysis

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-83. Work Force Analysis

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-84. Availability Analysis

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-85. Utilization Analysis and Hiring and Promotion Goals

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

Agency

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-86. Employment Analyses

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-87. Identification of Problem Areas

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-88. Program Goals

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-89. Discrimination Complaint Process

PREVIOUS SUBMISSION:

Agency

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-90. Goals Analysis

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-91. Upward Mobility

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

SECTION 46a-68-93. Innovative Programs

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

PROPOSALS/RECOMMENDATIONS:

Agency

SECTION 46a-68-94. Concluding Statement

PREVIOUS SUBMISSION:

This section was in compliance in the prior filing.

PRESENT SUBMISSION:

This section is _____ Deficient _____ Weak X In Compliance

CONCLUSION:

The proposed affirmative action plan submitted by Charter Oak State College for the filing date of March 30, 2023 has been voted APPROVED.

Section 46a-68-78 Policy Statement

Charter Oak State College is committed to equal opportunity and to the effective implementation of affirmative action. The Connecticut State Colleges and Universities (CSCU) oversees the state universities, Connecticut State Community College, and Charter Oak State College. We share in their efforts to promote representative racial and ethnic diversity among our students, faculty, administrators and staff as well as compliance with Title IX requirements and the Americans with Disabilities Act (ADA).

The College recognizes that equal opportunity means employment without consideration of race; color; sex (including pregnancy, sexual harassment and sexual assault); workplace hazards to reproductive systems, religious creed; marital status; national origin; victims of domestic violence; alienage; ancestry; intellectual disability; past or present history of mental disability; intellectual disability; physical disability (including blindness); age; veteran status; gender identity and expression, sexual orientation, previously opposed discrimination or coercion, prior conviction of a crime; erased criminal history; retaliation for protected activity; or other factors that cannot lawfully be the basis for employment action, unless there is a bona fide occupational qualification. The College does not request or require family medical history, nor does it discriminate against any person based on genetic information, veteran status, or a person with a prior conviction of a crime. It further recognizes that the goal of affirmative action is equal opportunity. The College's Affirmative Action Program creates positive action, undertaken with conviction and effort, to overcome the present effects of past practices, policies or barriers to equal employment and to achieve the full and fair participation of women, Blacks and Hispanics and any other underrepresented group found to be underutilized in the workforce or affected by policies or practices having an adverse impact.

As the President and appointing authority of Charter Oak State College and responsible for carrying out College policies, I remain committed to affirmative action, the institution's affirmative action plan, and to equal employment opportunity as an immediate and necessary agency objective of our organization. I expect my staff to successfully implement the program's objectives and evaluation. Annual evaluations of managerial staff also include assessments of responsibilities regarding these provisions. A link has been made available to these laws which mandate and regulate our plan and program.

This Policy Statement is based on the spirit and letter of state and federal anti-discrimination laws, regulations and executive orders. Enclosed is an attachment of these laws which mandate and regulate our plan and program.

In accordance with the attached legal requirements, every agency staff member will share in the responsibility to implement this policy. In all aspects of the employment process, including recruitment, selection, compensation, assignment, promotion and upgrading, training, transfer, discipline, termination, layoff and recall, and all other terms, conditions, and privileges of employment every agency staff member will share the responsibility of applying internal and external policies of equal opportunity.

The Affirmative Action Officer will monitor all activities undertaken in these areas and shall take reasonable action in relation to problems disclosed, such as to make recommendations for policies and procedures that will eliminate actual or potential problems, establish goals and timetables which recognize the race, sex or national origin of employees and applicants for employment.

All members of Charter Oak State College shall ensure that no person be excluded from participation in, denied benefits of, or otherwise be discriminated against under any program because of their race; color; sex (including pregnancy, sexual harassment and sexual assault); workplace hazards to reproductive systems, religious creed; marital status; national origin; victims of domestic violence; alienage; ancestry;

intellectual disability; past or present history of mental disability; intellectual disability; physical disability (including blindness); age; veteran status; gender identity and expression, sexual orientation, previously opposed discrimination or coercion, prior conviction of a crime; erased criminal history; retaliation for protected activity; or other factors that cannot lawfully be the basis for employment action, unless there is a bona fide occupational qualification. Additionally, we will not knowingly use the services of, patronize, nor otherwise deal with any business, contractor or agency that engages in acts of unlawful discrimination. We are committed to recognizing the hiring difficulties experienced by the physically disabled and by older persons. Program goals and timetables will be established to overcome the present effects of past discrimination, if any, to achieve the full and fair utilization of physically disabled and older persons in the workforce.

Sexual harassment, another form of sex discrimination, will not be tolerated in any workplace overseen by the Board of Regents. Sexual harassment is a violation of Section 703 of Title VII of the Civil Rights Act and Section 46a-60(a)(8) of the Connecticut General Statutes. Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct constitute sexual harassment when (1) submission to such conduct is made either explicitly or implicitly a term or condition of any individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. Sexual harassment shall constitute grounds for disciplinary action.

Rebecca Cannon-Klemenz, CSU Equal Employment and Opportunity Specialist, served as the College's Affirmative Action Officer through the plan year 2024. The current Affirmative Action Plan was developed by Charter Oak State College and the CSU Office of Compliance.

Internal complaints involving the plan and affirmative action policy may be forwarded to Serina Julien, Director of Human Resources.

Ed Klonoski

A handwritten signature in black ink, appearing to read "Ed Klonoski".

President, Charter Oak State College

Date: March 4, 2025

Affirmative Action Policy Statement: CSCU System

As the appointing authority for Connecticut State Colleges & Universities ("CSCU"), I am fully committed to the achievement of the affirmative action goals and timetables set forth in this Affirmative Action Plan and urge all parts of the CSCU community to assist us in achieving our goals. As a system, we acknowledge that affirmative action is an immediate and necessary objective.

The goal of affirmative action is equal opportunity. It is the need and purpose of affirmative action to overcome the present effects of past practices or policies that may have created barriers to equal employment opportunity for all current and future employees. A policy of nondiscrimination was consistently applied without regard for age, ancestry, color, national origin, gender identity or expression, genetic information, learning disability, marital status, intellectual disability, physical disability (including but not limited to blindness), present or past history of mental disability, prior criminal record, race, religious creed, sex (including pregnancy and sexual harassment), sexual orientation, retaliation for previously opposed discrimination or coercion, veteran status, members of the CT Civil Air Patrol, victims of domestic violence and workplace hazards to reproductive systems. Unless the provisions of Section 46a-80(b) or 46a-81(b) of the Connecticut General Statutes are controlling or there are bona fide occupational qualifications excluding persons in one of the above protected groups.

We are fully committed to the principles and practices of affirmative action and equal opportunity in employment and provide our services in a fair and impartial manner. We continually examine the practices and promotion of employees with the express purpose of achieving our goal of a full representative workforce. The Region recognizes the hiring difficulties experienced by individuals with disabilities and by many older persons and will set program goals to address any problem areas identified.

Considering the dual role of affirmative action to provide an environment for the application of equal opportunity principles and to monitor the employment process to prevent instances of illegal discrimination from arising or existing, the following procedures are operative within the Region:

1. Every effort is made to recruit and hire protected group members reflective of their availability in the job market. An employment process is in place at the CSCU System Office that addresses the role affirmative action plays at each stage. A summary of Hiring Goals and Program Goals is included in the plan shall be posted with CSCU's Affirmative Action Policy Statement on all official bulletin boards.
2. Opportunities are made available to all employees for training, development, and advancement consistent with individual ability and performance.
3. Principles of equal opportunity and affirmative action will undergird decisions on promotions as a result of the institution strictly imposing only those requirements valid to the process.
4. Personnel decisions regarding transfer, reassignment, separation and termination encompasses the principles of equal opportunity and affirmative action to assure that members of any protected class will not be adversely impacted.

Affirmative Action Policy Statement: CSCU System

5. All educational programs and student support services are administered in a manner which do not adversely impact students because of age, ancestry, color, national origin, gender identity or expression, genetic information, learning disability, marital status, intellectual disability, physical disability (including but not limited to blindness), present or past history of mental disability, prior criminal record, race, religious creed, sex (including pregnancy and sexual harassment), sexual orientation, retaliation for previously opposed discrimination or coercion, veteran status, victims of domestic violence and workplace hazards to reproductive systems, or any other protected group recognized by local, state or federal laws and regulations.

The CSCU System Office Equal Employment Opportunity Officer is located at CSCU, 61 Woodland Street, Hartford, CT 06105. I have delegated to them and their team the lead responsibility for all matters within the CSCU System Office related to affirmative action and equal employment opportunity. The CSCU System Office has an internal discrimination complaint process for employees who believe that they have been discriminated against.

The Affirmative Action Policy Statement will be posted throughout the System Office and distributed to all employees in accordance with statutory mandates.



Terrence Cheng, Chancellor
Chancellor, Connecticut State Colleges & Universities

6/26/2024

Date

Policy #	Policy Name	Reso #	Date Approved
4-05	Affirmative Action and Equal Employment Opportunity Policy Statement	BR 13-117 BR 24-079	2013-09-19 Revised 2024-07-31

Affirmative Action and Equal Employment Opportunity Policy Statement

The Board of Regents of Higher Education (“Board of Regents”) and Connecticut State Colleges and Universities (“CSCU”) are committed to leading, by example, in the areas of equal employment opportunity and affirmative action. The Board of Regents and the Connecticut State Colleges and Universities affirmatively seek to attract to its faculty, staff, and student body qualified persons of diverse backgrounds. Additionally, the Board of Regents commits to promote representative racial and ethnic diversity among its students, faculty, administrators, and staff at public institutions of higher education. Equal employment opportunity and affirmative action are essential to achieving public higher education’s goals of academic excellence and quality.

Equal Employment Opportunity

The Board of Regents is an equal employment opportunity/affirmative action employer. To ensure that employees and job applicants are not subjected to unlawful discrimination, it is the Board of Regent’s policy statement to comply with all State and Federal laws and regulations that prohibit employment discrimination and mandate specific actions for the purpose of eliminating present and past discrimination. Equal employment opportunity is the purpose and goal of affirmative action.

In accordance with this Policy and as delineated by federal and Connecticut law, the Board of Regents deems equal employment opportunity to be the employment of individuals without consideration of actual or perceived age, ancestry, color, gender identity or expression, genetic information and/or family medical history, intellectual disability, learning disability, parental, family or marital status, past or present history of mental disability, physical disability, pregnancy or related conditions, race or national origin, religion or creed, sex, sexual orientation, veteran or military status, arrest and/or criminal conviction status, lawful source of income, citizenship or immigration status, status as a victim of domestic violence, workplace hazards to reproductive systems, or any other protected characteristic, including protections for those opposing discrimination or participating in any grievance process within the institution, with the Equal Employment Opportunity Commission and/or the Connecticut Commission on Human Rights and Opportunities (“CHRO”), or other factors that cannot lawfully be the basis for employment actions, unless there is a bona fide occupational qualification under applicable local, state, or federal law.

Affirmative Action

Affirmative Action is a positive program of purposeful activity undertaken with conviction and effort to overcome present effects and past practices, policies, and barriers to equal employment opportunity. Affirmative action plans and programs are designed to achieve the full and fair participation of all protected class members found to be underutilized in the workforce or adversely affected by past policies and practice.

The Board of Regent's commitment to affirmative action requires that the System Office and each College and University within the Connecticut State Colleges and Universities System make good faith efforts that may be necessary in all aspects of personnel administration to ensure that the recruitment and hiring of underrepresented individuals reflect their availability in the job market; that the causes of underutilization are identified and eliminated; that alternative approaches are explored when personnel practices have a negative impact on protected classes; and, that the terms and conditions, and privileges of employment, including upward and lateral mobility, are equitably administered.

The Board recognizes the employment difficulties experienced by individuals with disabilities and by many older people. Therefore, the Board will take necessary steps to identify and overcome areas of underutilization of such people in the workforce and to achieve their full participation in all System programs, processes, and services.

The Board of Regents is committed to ensuring that all Connecticut State Colleges and Universities services and programs are provided in a fair and impartial manner and thus has established affirmative action and equal employment opportunity as immediate and necessary system-wide objectives.

Each College and University and the System Office prepares an annual Affirmative Action Plan. The Affirmative Action Plans must comply with Connecticut law and regulations, provide a detailed, results-oriented set of procedures that blueprints a strategy to combat discrimination and implement equal employment opportunity and affirmative action goals. The objective of the Affirmative Action Plans is to set quantitative and non-quantitative goals, that promote affirmative action and/or eliminate any policy or employment practice that adversely affects protected class members.

Complete versions of the Affirmative Action Plans for each College and University within the Connecticut State Colleges and Universities System, and the Affirmative Action Plan for the System Office can be found online at: <https://www.ct.edu/hr/nondiscrimination>.

The Board of Regent's policies and procedures against discrimination and harassment are included in the Affirmative Action Plans along with complaint procedures. Faculty, employees, students and other individuals participating in or attempting to participate in the CSCU's education programs or activities may file complaints of discrimination, harassment, retaliation or alleged violations of this Policy may do so by contacting:

Lori Lamb, Interim Assistant Vice Chancellor for HR & Labor Relations
Phone: 860-723-0250
Address: 61 Woodland St., Hartford, CT 06105

Faculty, employees, students and others shall not be subjected to harassment, intimidation or any type of retaliation because they have (1) filed a complaint; (2) assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of any

federal, state or local law requiring equal employment opportunity; (3) opposed any act or practice made unlawful by any federal, state or local law requiring equal opportunity; (4) exercised any other legal right protected by federal state or local law requiring equal opportunity.

Accountability

The Board of Regents hereby commits to ensure that Connecticut State Colleges and Universities make every effort to implement effective Affirmative Action Plans within timetables set forth in such Plans. The Board of Regents fully expects the CSCU executive and supervisory staff to treat compliance with Federal and State of Connecticut affirmative action statutes as a top priority and take positive steps to ensure the successful implementation of the policies, procedures and objectives of affirmative action and equal opportunity throughout Connecticut State Colleges and Universities, including the System Office.

In issuing this **Affirmative Action and Equal Employment Opportunity Policy Statement**, the Board of Regents reiterates the need for affirmative action and equal opportunity and attests to the Connecticut State Colleges and Universities' determination to identify strengths and weaknesses throughout our employment system, resolve problems when they appear, recruit employees vigorously and affirmatively, and retain current employees while also helping them prepare for advancement.



**CONNECTICUT STATE COLLEGES AND UNIVERSITIES SYSTEM OFFICE
AMERICANS WITH DISABILITIES ACT (ADA)
POLICY STATEMENT**

The Connecticut State Colleges and Universities System Office (System Office) does not discriminate on the basis of disability in the administration of, or access to, its programs, services or activities. Under this policy, a person with a disability is defined as "a person who has a physical or mental impairment that substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having an impairment."

As President, I have designated the following individual to coordinate the System Office compliance with the non-discrimination requirements of Section 35.1067 of the Department of Justice regulations:

Lori Lamb
Interim Assistant Vice Chancellor for Human Resources and Labor Relations
lori.lamb@ct.edu
860-723-0727

Should you wish to notify us of barriers that may exist in equal access to any program, service, or activity offered by our office or to obtain information regarding the provisions of the Americans with Disabilities Act and your rights, you are encouraged to contact the ADA Coordinator listed above. If you feel that you need a reasonable accommodation as a result of your disability to allow you to perform the essential functions of your position, please follow the attached ADA procedure for requesting a reasonable accommodation.

A handwritten signature in black ink, appearing to read "Tommy Chy", written over a light blue horizontal line.

CSCU President

November 10, 2021

Date

PROCEDURE FOR REQUESTING REASONABLE ACCOMMODATION UNDER THE AMERICANS WITH DISABILITIES ACT (ADA)

The Americans with Disabilities Act of 1990, as amended, requires employers to provide “reasonable accommodation” to qualified individuals with disabilities who are employees or applicants unless to do so would cause an “undue hardship.” The term reasonable accommodation generally is any change in the work environment or in the way things are customarily done that enables a employee with a disability to enjoy equal employment opportunities. The CSCU System Office must analyze each request for accommodation on a case-by-case basis and make a good faith effort to reasonably accommodate a qualified employee or applicant with a disability.

As a general rule, the individual with a disability must inform the employer that an accommodation is needed since employers are only obligated to provide reasonable accommodation of known disabilities. Under the ADA, the employer and the employee must engage in an informal interactive process to clarify what the individual needs and identify the effective reasonable accommodation. The employer may ask questions about the nature of the disability and the individual’s functional limitations in order to identify an effective accommodation. Further, if the disability and/or need for an accommodation are not obvious, the employer may ask for more information including documentation to establish that the person has a disability and that it necessitates a reasonable accommodation. At its discretion, the System Office may require that the documentation about the disability and the functional limitations come from an appropriate health care or rehabilitation professional.

The employer is not required to provide the reasonable accommodation that the individual requests. Rather, the employer may choose among reasonable accommodations as long as the chosen accommodation is “effective,” i.e., it would remove a workplace barrier, thereby providing the individual with an opportunity to perform the essential functions of the position. The employer may choose a less expensive or burdensome accommodation among available effective reasonable accommodations.

REASONABLE ACCOMMODATION PROCESS

1. Initiation of the Request for Reasonable Accommodation

In order for the System Office to analyze each request for accommodation, the requesting employee or job applicant should complete the attached two forms, the **“Reasonable Accommodation Request Form,”** and the **“Health Care Provider Release Form.”** When deemed necessary by the System Office, the employee or job applicant must provide current documentation from a health care provider regarding the nature of the disability, its impact on a major life function, and need for accommodation.

The employee/job applicant seeking a reasonable accommodation must complete these forms and provide them to the HR generalist assigned to their campus or directly to the System Office’s ADA Coordinator: *Nicholas D’Agostino, Director of Equal Employment Opportunity*, via email at Ndagostino@commnet.edu or phone at 860-723-0727.

The request for accommodation should include current documentation from a health care provider (if required by the System Office) that:

- States the nature of the disability in order to establish that the individual has a mental or physical impairment that substantially limits a major life activity, has a record of such an impairment, or is regarded as having such an impairment.
- Explains the functional limitations the employee has as a result of their disability as it relates to the job duties.
- Suggests accommodations that would remove the barriers to the employee/applicant's ability to perform the essential functions of the job.

2. Essential Job Function Analysis Conducted by System Office and Determination of the Request For Reasonable Accommodation

The ADA Coordinator will contact the Department or Unit and conduct an essential job function analysis. The System Office retains the right to establish the essential job functions of the position for which a request for accommodation has been made.

After the above information has been received, the following steps will be taken:

- A review by a designated health professional may be required to substantiate that the employee has a disability and needs a reasonable accommodation.
- If appropriate, a meeting may be held with the employee, ADA Coordinator, and management/supervisory personnel from the department to discuss the employee's limitations as they relate to the essential functions of the job and to discuss various options in regard to accommodating the employee.
- The System Office Administration retains discretion to select an accommodation which is deemed to be effective in removing the workplace barrier that is impeding the individual with a disability giving due consideration to the preferences of the employee or applicant.
- Ongoing monitoring to ensure the effectiveness of any approved ADA accommodation.

Any questions regarding this process should be directed to the System Office's ADA Coordinator.

[References: 42 U.S.C. §12101 *et seq.*; .29 C.F.R. § 1630.9]

Complaint Procedure

For complaints of alleged violations of the Americans with Disabilities Act, employees should refer to the System Office's internal complaint procedure as contained on the CSCU Human Resources forms page under Labor Relations or at https://www.ct.edu/files/pdfs/LR_Complaint_Form_Fillable_2020.pdf.

CONFIDENTIAL

REASONABLE ACCOMMODATION REQUEST FORM

To be completed by employee or job applicant requesting an accommodation. Send to:

Nicholas D'Agostino
CSCU Director of Equal Employment Opportunity
NDagostino@commnet.edu
860-723-0727

This form must be used by CSCU and CT State employees and/or applicants for employment who believe they have a disability and wish to request a reasonable accommodation under the Americans with Disabilities Act (ADA) or other applicable State and Federal civil rights laws. By considering this request, the System Office does not consider or regard the person making the request as having a disability as defined by the ADA, the Connecticut Fair Employment Practices Act, or any other applicable law.

The purpose of this form is to assist the System Office in determining whether, or to what extent, a reasonable accommodation is appropriate for an employee or applicant for employment. This form **must** be maintained separately from the employee's personnel file and is a **confidential** document.

Fill out all sections that apply to you

Name: _____ Date of Request _____

Job Title/Classification: _____ Phone #: _____

Supervisor's Name: _____ Phone #: _____

Department/Unit: _____

If job applicant, for what position are you applying? _____

1. Accommodations Requested (Be as specific as possible, for example adaptive equipment, reader, interpreter, training, schedule change, etc.):
2. Reason for the request (at this time, not disclose your diagnosis; explain your disability-related limitations and how this accommodation will help you do your job.):
3. Is this limitation permanent, temporary, unknown duration (please specify anticipated date, if applicable):

4. Medical verification of impairment from my physician or health care provider (check the appropriate box):

I have enclosed the documentation for this request.

The disability and the need for reasonable accommodation is obvious and no medical documentation is needed.

Explain:

I, _____, give _____ the Connecticut State Colleges and Universities System Office permission to explore coverage and reasonable accommodations under the Americans with Disabilities Act of 1990, and all applicable State and Federal laws. I understand that all information obtained during this process will be maintained and used in accordance with the ADA, including its confidentiality requirements.

Signature of Requestor

Date

To Be Completed By the ADA Coordinator

Accommodation Request is: Approved ☐ Denied ☐ Modified ☐ (Explain below)

Comments:

Signature of ADA Coordinator

Date

Reviewed by VP of HR

Date

HEALTH CARE PROVIDER RELEASE FORM

I, _____ (employee/applicant), give _____ Connecticut State Colleges and Universities System Office permission to contact (health care provider). I understand the reason for this contact is to advise the System Office about my functional abilities and limitations in relation to my job functions. I understand that the System Office will provide (health care provider) with specific information about the position, including the essential functions and specific requirements. All information obtained from employee medical examinations and inquiries will be job-related and consistent with business necessity. All information obtained will be maintained and used in accordance with the Americans with Disabilities Act of 1990 confidentiality requirements, and all other applicable State and Federal laws.

Employee/Applicant Signature

Date

Section 46a-68-79
Internal Communication

This Affirmative Action Plan is considered a public document and is available for review and comment online or during regular business hours at the CT State President's Office at 185 Main Street, New Britain, CT 06051. The Affirmative Action Plan can be available for review at any time throughout the year to accommodate all of the different work schedules and staff teaching or working nights and weekends.

The Affirmative Action Policy statement and a summary of the goals and objectives of the AA Plan are sent electronically to all employees via email.

The Charter Oak State College notifies its employees of their opportunity to review the Affirmative Action Plan, Policy Statement and Summary of Hiring and Promotional Goals and to provide comments after it has been reviewed by the Commission on Human Rights and Opportunities (CHRO). Written comments should be sent directly to Serina Julien, Human Resources Director. Ms. Julien's office is located at Charter Oak State College, 185 Main Street, New Britain, CT 06051 and may be reached at (860) 515-3853 or sjulien@charteroak.edu to coordinate a time to review and comment on the current AA Plan. The Human Resources Director maintains copies of all communications and comments received, including their receipt date. There were no comments submitted during the 2020-2022 AA Plan period.

Charter Oak State College maintains, as required by the State Library, records retention schedules for state agencies, copies of all affirmative action-related internal communications and comments received pursuant to subsection (b) of this section and notes the date such comments were received.

Additional Internal Communication for Charter Oak State College

During the reporting period, the Equal Employment Opportunity staff and/or VP of Diversity Equity and Inclusion met regularly with the President and/or his leadership team on EEO/AA/ Diversity matters throughout the year. The Equal Employment Opportunity staff and/or VP of Diversity Equity and Inclusion met regularly with managers on matters, including but not limited to, the search compliance and selection process, discrimination investigations, and ADA compliance. For the next plan year, matters relating to EEO and affirmative action will be managed by the Human Resources Director.

The Equal Employment Opportunity staff and/or VP of Diversity Equity and Inclusion met with every search committee and participants in their search charge training. Search charges will continue to be provided by the EEO team. Topics covered during a search charge training include affirmative action, numerical goals, equal employment opportunity and bias. To ensure a robust pool of volunteers are available throughout the system, CSCU solicited volunteers to serve on search committees. Notice of job opportunities are sent weekly to the entire CSCU community.

The Equal Employment Opportunity staff and/or VP of Diversity Equity and Inclusion continually meets with HR, marketing, and leadership to ensure all materials, postings, and the websites comply with relevant laws and regulations and are free from bias.

During the reporting period, the CSCU and the Board of Regents adopted new and revised civil rights policies. Notification was sent system wide, and a sample of the notice is included in this section.

Training

As one of the institutions within the Connecticut State Colleges and Universities (CSCU) system, Charter Oak State College's new employees receive system wide orientation through a partnership with CSCU and the EEO team. New employees attend orientation on their first day, which includes an overview of policies and state mandatory diversity training. During this period, new employees received Diversity training through this arrangement.

Charter Oak State College, through CSCU, uses an online program to meet compliance with sexual

harassment prevention training. New employees are assigned to the training upon hire to ensure compliance. During the reporting period fifty-four employees participated in the training.

During the current plan year, Domestic Violence Training was developed to comply with the training requirement. Fifty-three employees completed the training during the reporting period.

Beyond required training, the CSCU system office periodically offers trainings to employees within the system. Communication is sent system wide, and employees are invited to participate. A sample of these training courses is provided on the following pages.

From: Ed Klonoski <eklonoski@charteroak.edu>

Sent: Tuesday, June 20, 2023 2:15 PM

To: Charter-Staff (External Contact) <charteroakallstaff@charteroak.edu>

Cc: D'Agostino, Nicholas <NDAgostino@commnet.edu>; CannonKlemenz, Rebecca <rcannonklemenz@commnet.edu>

Subject: Affirmative Action Report

Dear Friends,

We have finished our Affirmative Action report, with much help from our system partners, and it was approved by CHRO with a two year reporting cycle. I have attached the letter for your review.

Ed

Ed Klonoski, President
Charter Oak State College
55 Paul Manafort Sr. Drive
New Britain, CT 06053
860-515-3888

TO: Charter Oak State College Employees
FROM: Ed Klonoski, President
DATE: June 16, 2023
RE: COSC Affirmative Action Plan and Policy Statement Annual Notice to Employees

The Charter Oak State College's Affirmative Action Plan and Policy Statement have been approved by the Commission on Human Rights and Opportunities (CHRO). The Affirmative Action Plan is available to review in the Human Resources Office through the end of November 30, 2024. This Affirmative Action Plan covers the reporting period of December 1, 2020 through November 30, 2022.

As President, I am strongly committed to promoting the principles of affirmative action, equal employment opportunity, diversity, equity and inclusion in the workplace. The Affirmative Action Plan guides us in our efforts to comply with state laws and regulations. Specifically, to identify strengths and weaknesses in our employment system, resolve problems and concerns as they appear, help prepare our current employees for advancement through training programs and affirmatively recruit new employees.

The Charter Oak State College's Affirmative Action Plan, Affirmative Action Policy Statement, and Charter Oak State College Affirmative Action Plan Executive Summary have been added to the CSCU website along with the Discrimination Complaint Procedure and BOR Sexual Misconduct Policy. Please take a few minutes to review these documents:

1. [Charter Oak State College Affirmative Action Plan](#)
2. [CSCU Affirmative Action Policy Statement](#)
3. [Charter Oak State College Affirmative Action Plan Executive Summary](#)
4. [CSCU Discrimination Complaint Procedure](#)
5. [BOR Sexual Misconduct Reporting, Supportive Measures and Processes Policy](#)

All employees shall conduct themselves in a respectful and professional manner consistent with the various elements of the Affirmative Action Plan and supervisors will be held accountable for the day-to-day oversight and compliance of staff and related programs. Information regarding Equal Employment Opportunity can also be found on the CSCU website: <https://www.ct.edu/hr/diversity>

If you have any questions or comments about any aspect of the Affirmative Action Plan, Policy Statement, Summary of Objectives, or the Discrimination Complaint Process including suggestions for future enhancements, please contact John-Paul Chaisson-Cardenas, Vice President of Diversity Equity and Inclusion at jchaisson-cardenas@commnet.edu. The Affirmative Action Plan is available to review through November 30, 2024. Any and all comments and questions on the Affirmative Action Plan will receive a response will be accounted for in the next submission.

Thank you for your ongoing support and commitment.

Sincerely,



Ed Klonoski, President
Charter Oak State College

CHARTER OAK STATE COLLEGE
AFFIRMATIVE ACTION PLAN EXECUTIVE SUMMARY
REPORTING PERIOD: DECEMBER 1, 2020 – NOVEMBER 30, 2022

Overall Status of the Affirmative Action/Equal Employment Opportunity Program

The Charter Oak State College ("COSC") remains committed to a policy of affirmative action, equal employment opportunity, diversity, inclusion, and equity in the workplace. The COSC has just submitted the COSC plan which covers the reporting period December 1, 2020 – November 30, 2022 and details our efforts, goals, and responsibilities, and establishes our new hiring, promotional and programmatic goals for 2022-2024.

Copies of the Affirmative Action Plan is available in both paper and electronic form. Copies can be made available through the Human Resources Office, the President's office, and can be downloaded from the CSCU Website. As a public document, the Plan was (and remains) available for review by employees, and the general public throughout the entire reporting period. The respective unions were encouraged to review the last AA Plan and direct any comments in writing the Equal Employment Opportunity Officer. During the past reporting period, no comments were received.

The COSC is committed to ensuring that the workforce is in parity with the relevant labor market area, demonstrating good faith efforts to achieving hiring, promotion and program goals, and addressing all deficiencies, omissions and errors as noted by the Commission on Human Rights and Opportunities (CHRO).

Affirmative Action, Equal Employment Opportunity, Diversity and Equity Responsibilities

The College strives to be in compliance with the CT Commission on Human Rights and Opportunities (CHRO), Equal Employment Opportunity Commission (EEOC) and the Office of Civil Rights (OCR) mandatory requirements and related laws, statutes and regulations.

The COSC has a responsibility for compliance with affirmative action, equal employment opportunity, diversity, inclusion and equity, Americans with Disabilities Act (ADA) and Title IX mandates and to set an example for the entire CSCU system to embrace these initiatives.

Affirmative Action Plan (AAP) Requirements

The CT Affirmative Action Regulations require that the ultimate responsibility for promoting and enforcing affirmative action rests with the Appointing Authority or Agency Head.

The COSC is required to file an annual Affirmative Action Plan for the current reporting period that covers the timeframe covering December 1, 2020 – November 30, 2022. CHRO reviews the AAP by the Regulations "Standard of Review" and by enforcing affirmative action and equal employment opportunity compliance.

The AAP has seventeen (17) narrative and statistical elements that analyze different parts of the employment process at each stage of the hiring & selection process. Some parts of the AAP required by CT Regulations include:

- Analyzing all personnel activity including all hiring, promotions, upward mobility opportunities and separations in the workforce;
- Reviewing the employment process to identify barriers to affirmative action, equal employment opportunity, diversity, inclusion and equity;
- Tracking all applicants through the entire employment process to identify the step at which they are no longer considered for the position;
- Setting hiring and promotional goals by comparing the workforce with similar job categories in the available census, labor, educational and other sources of data;

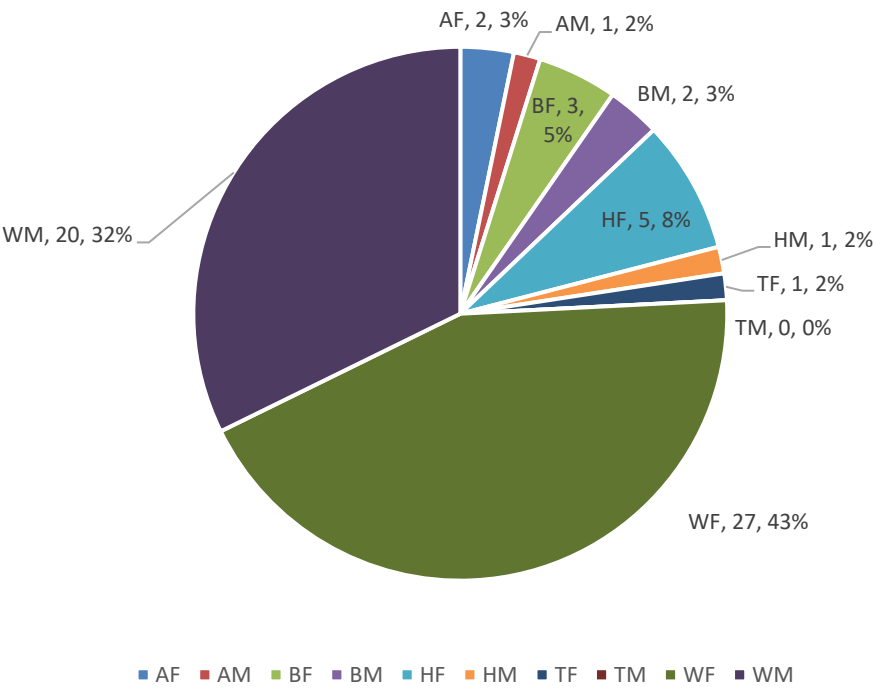
The most critical part of the AA Plan is the Goals Analysis narrative section. The CT CHRO Regulations require this section to be complete and detailed about every applicant that applies for every position during the reporting period. This section is difficult to develop and requires that each search committee is responsible for providing documentation and detailed reasons for selection or non-selection of every applicant.

The standard that agencies must show “good-faith efforts” when hiring non-goal candidates. Good faith efforts definition means the degree, care and diligence which a reasonable person would exercise in the performance of legal duties and obligations at a minimum it includes all those efforts reasonably to achieve the full and fair compliance. It includes efforts toward full statutory and regulation requirements.

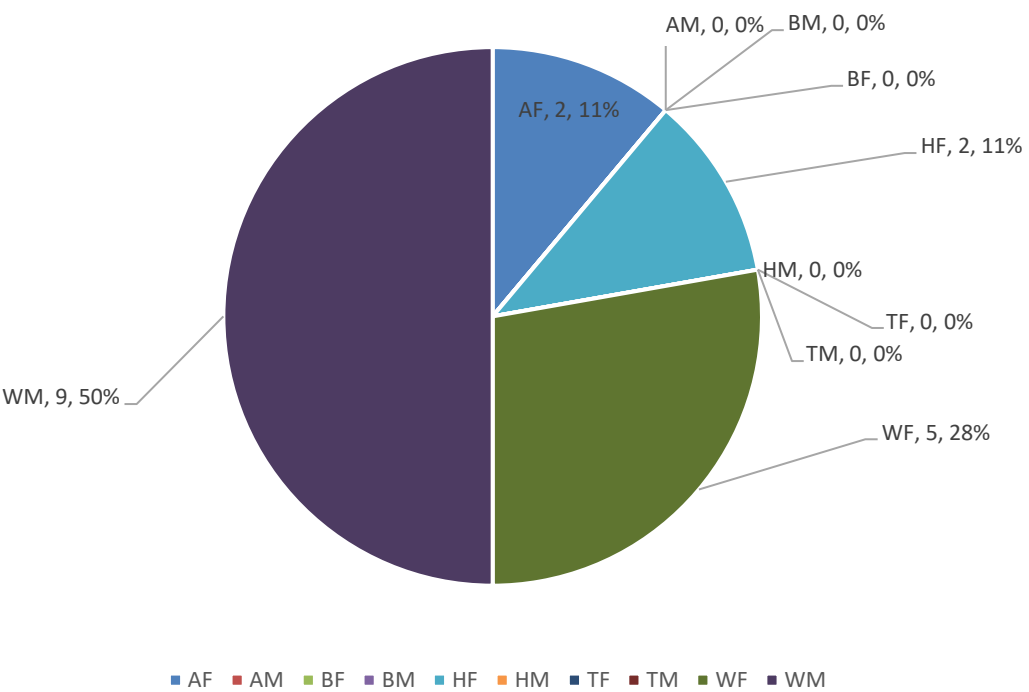
Charter Oak State College Workforce

WORKFORCE ANALYSIS													Form 83A
TOTAL WORKFORCE													
AGENCY:	Charter Oak State College						REPORTING DATE: November 30, 2022						
OCCUPATIONAL CATEGORY/JOB TITLE	GRAND	TOTAL	TOTAL	WHITE		BLACK		HISPANIC		AAIANHNPI		2 OR MORE RACES	
	TOTAL	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Executive/Managerial	18	9	9	9	5	0	0	0	2	0	2	0	0
%TOTAL	100.0%	50.0%	50.0%	50.0%	27.8%	0.0%	0.0%	0.0%	11.1%	0.0%	11.1%	0.0%	0.0%
Professional	44	15	29	11	22	2	3	1	3	1	0	0	1
%TOTAL	100.0%	34.1%	65.9%	25.0%	50.0%	4.5%	6.8%	2.3%	6.8%	2.3%	0.0%	0.0%	2.3%
TOTAL	62	24	38	20	27	2	3	1	5	1	2	0	1
%TOTAL	100.0%	38.7%	61.3%	32.3%	43.5%	3.2%	4.8%	1.6%	8.1%	1.6%	3.2%	0.0%	1.6%

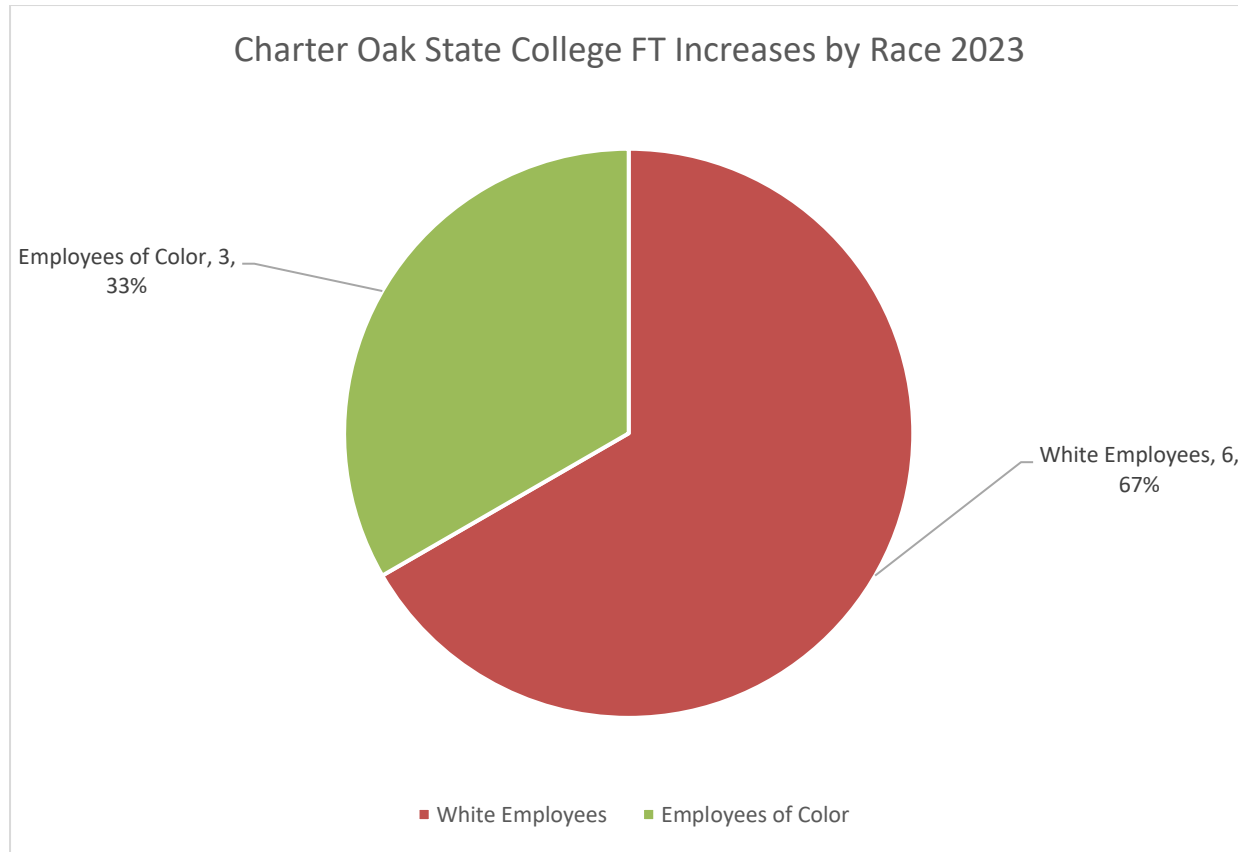
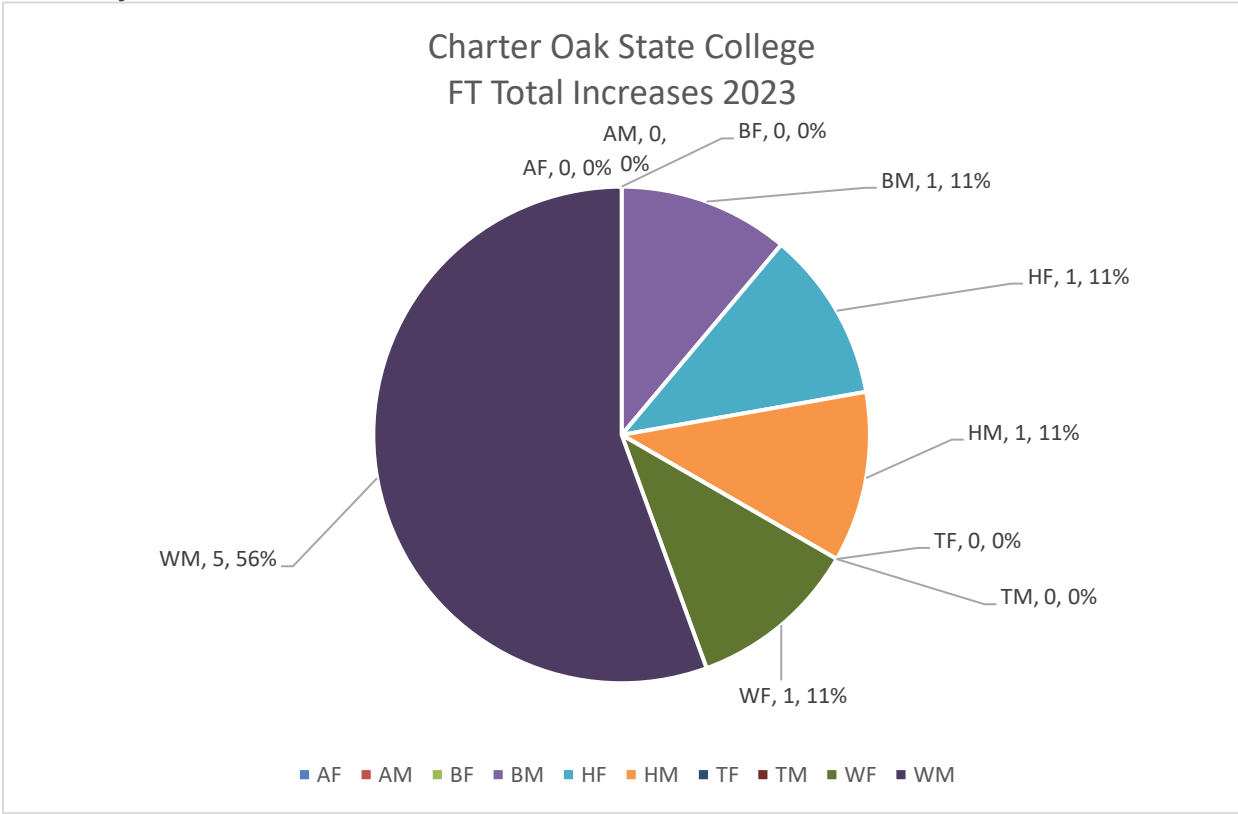
Charter Oak State College Total Workforce 2023



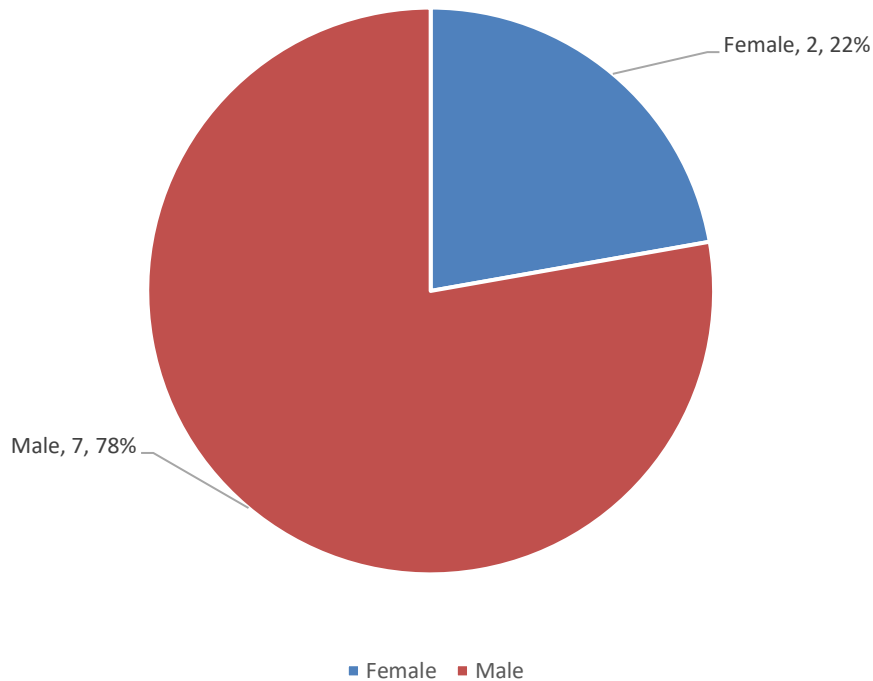
Charter Oak State College Executive Workforce 2023



Summary of 2021-2022 Increases to the Shoreline-West Workforce:



Charter Oak State College FT Increases by Sex 2023



Summary of the 2020-2022 Affirmative Action Plan Achievements:

2020-2022 Goal Achievements

EEO Category	Goals Established	Hires	Promotions	Goal Achievement
Executive	H: 1WF, 1BF P: NONE	2WM	NONE	0 out of 2 increases met goals or 0%
Professional Non-Faculty-All other Titles	H: 2BF, 2HM, 1AM, P: None	5WM, 1Wf, 1BM, 1HM, 1HF	NONE	1 out of 5 goals or 20%
Program Goals				
Program Goals	3 Established			3 out of 3 or 100%
<p>1. Continue to work with each College department head to ensure that open job announcements are posted to the listserv of all Associations their department is a member.</p> <p>Goal Achievement: This goal was achieved. In addition to departmental listservs and networks, COSC transitioned to HR Shared Services and began coordinating recruitment efforts through this program. As such, job announcements reached both national and local sources, targeted recruitments occurred for specialized fields, and COSC, EEO, and Talent worked together to ensure we received diverse qualified applicant pools.</p>				

2. Continue to work with CADEP to increase the outreach to under-utilized groups.

Goal Achievement: This goal was achieved. In addition to broadening recruitment efforts through HR Shared Services, COSC has collaborated with CADEP to advertise their positions and attend scheduled meetings to network. Members of EEO remain members of CADEP and continue to utilize the expertise within this group.

3. Continue to work with the other State Colleges and Universities for offerings to our employees of diversity and inclusion workshops.

Goal Achievement: This goal was achieved. COSC has offered systemwide opportunities for training on DE&I for their staff members. Additionally, COSC has utilized the Equal Employment Opportunity Shared Service to provide all new hires with the required training diversity and sexual harassment training. This will continue as a standing practice going forward.

Summary of the 2020-2022 Affirmative Action Goals and Objectives

The following hiring and promotion goals have been set for the period December 1, 2022 – November 30, 2024 in accordance with Regulations of Connecticut State Agencies Section 46a-68-85.

Statewide/National – AA Plan Goals

Executive/Administrative/Managerial	H: 3WF, 1BM, 1BF, 1HM, 1AM P: NONE
Professional – All Other Titles	H: 1HM, 2AF P: NONE

PROGRAM GOALS:

The College sets the goals below to enhance its efforts to ensure affirmative action and equal employment opportunity compliance.

1. The College will support the CSCU System Office's goal to train all managers within the College on DEI, EEO, Civil Rights, and Managing a Diverse workforce.

Responsible persons: DEI and EEO Center of Excellence.

Timeframe: Completion by June 30, 2023.

2. The College will support the CSCU System Office's goal to train all staff on Domestic Violence.

Responsible persons: DEI and EEO Center of Excellence.

Timeframe: Completion by June 30, 2024.

CSCU Weekly Job Announcement Opportunities 07-09-23

From CSCU-Announcement <CSCU-Announcement@ct.edu>

Date Sun 7/9/2023 9:51 AM

To CSCU-Announcement <CSCU-Announcement@ct.edu>

Below is the list of the new job openings for CT State Community College, Charter Oak State College and Universities within the CSCU system. This list also includes the Department of Administrative Services (DAS) job openings.

If you are interested in one of the newly posted positions below, please click on the appropriate employment portal link or direct link, to find out more information about the position and application process.

For CT State Community College openings please submit a cover letter and resume via the employment portal at: [CT State Community College Career Page](#) by the deadline on the posting.

HOUSATONIC COMMUNITY COLLEGE

- Instructor of Graphic Design

For Board of Regents and Charter Oak openings please submit a cover letter and resume via the employment portal at: [BOR-Charter Oak](#) by the deadline on the posting.

CHARTER OAK STATE COLLEGE

- Associate Director of Enterprise Applications

For CT State Community College continuous recruitment openings (Part-time Lecturers, Non-Credit Lectures, Part-time Educational Assistants) please submit a cover letter and resume via the employment portal at: [CSCU Job Openings Page](#)

For CT State University Job announcements please follow the application instructions on the posting and submit all application materials by the deadline.

[Eastern CT State University](#)
[Central CT State University](#)
[Southern CT State University](#)
[Western CT State University](#)

Click on the link below to see all Department of Administrative Services (DAS) job openings.

[Job Openings - Department of Administrative Services \(jobapscloud.com\)](http://jobapscloud.com)

Click on the link below to see additional current job opportunities with the CSCU system.

[CSCU Human Resources - Jobs \(ct.edu\)](http://ct.edu)

Incomplete applications or those submitted after the closing date will not be considered and links to other sources to view resumes are not acceptable.

Please note that due to the large volume of applications received, we are unable to field phone/email inquiries and confirm receipt of completed applications.

All employment, if offered, is contingent upon proof of citizenship or employability under the requirement of the Immigration and Control Act (IRCA) and the successful passing of a background check.

CSCU is an Affirmative Action/Equal Opportunity Employer

CSCU and Board of Regents Adopt New and Revised Civil Rights Policies

From CSCU-Announcement <CSCU-Announcement@ct.edu>

Date Fri 8/2/2024 10:09 AM

To CSCU-Announcement <CSCU-Announcement@ct.edu>



CSCU and Board of Regents Adopt New and Revised Civil Rights Policies

Dear CSCU Community,

Earlier this week, the Connecticut Board of Regents for Higher Education voted to adopt an interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy, an updated Affirmative Action Policy Statement, and the interim Student Code of Conduct policy.

The new and revised policies come on the heels of the U.S. Department of Education promulgating new Title IX regulations that took effect August 1.

The interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy:

- Revises CSCU's procedures related to Title IX to comply with the new regulations.
- Closes gaps in our existing policies related to non-discrimination and harassment.
- Makes critical updates that clarify and streamline the sexual misconduct, non-discrimination, and harassment policies and procedures into one comprehensive policy that governs all members of CSCU's workplace and campus communities under the same rules.

Additionally, the Board passed revisions to the Student Code of Conduct and designated the policy as “Interim” given that additional revisions and input from campus administrators, faculty, and student leaders are necessary to finalize the Student Code of Conduct.

Thank you to Lori Lamb, Interim Assistant Vice Chancellor of Human Resources and Labor Relations, Kim Pacelli, the Interim System Office Title IX Coordinator, the CSCU Student Code of Conduct Task Force chaired by Jules Tetrault, Ed.D., Associate Vice President for Student Affairs and Dean of Students at Southern Connecticut State University, and to the Board’s Academic & Student Affairs and Human Resources and Administration Committees, for their tireless efforts in putting these policies together. We also appreciate the legal counsel of Vita Litvin, Interim General Counsel, and Shannon Walsh, Associate General Counsel, whose legal advice and expertise were instrumental in the drafting and formulation of the revisions to these policies.

In the coming year, all employees will receive required annual training on the scope of Title IX, including prohibited behaviors, reporting responsibilities, and other applicable regulatory changes. We will continue to offer students annual education on Title IX, reporting options, and resources.

We are continuing to monitor legal developments associated with Title IX to ensure CSCU stays compliant with the current laws.

These new policies will build on our efforts to ensure that CSCU’s colleges and universities continue to be learning environments that are safe, inclusive, and welcoming to all.

CSCU is steadfast in its commitment to making sure our institutions continue to be drivers of social mobility, opportunity, and life-long success for our students.

[Link to Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy](#)

[Link to Interim Student Code of Conduct](#)



From: [D'Agostino, Nicholas](#)
To: [Cannon-Klemen, Rebecca](#)
Subject: FW: New Employee Orientation - March 22, 2024
Date: Tuesday, June 11, 2024 11:32:14 AM
Attachments: [New Hire Orientation - Schedule \(6\).pdf](#)

Internal communication SO – Sample.

From: Kizer, Robert E <RKizer@ncc.commnet.edu>
Sent: Friday, March 22, 2024 10:04 AM
To: D'Agostino, Nicholas <NDAgostino@commnet.edu>
Subject: New Employee Orientation - March 22, 2024

Microsoft Teams meeting

Join on your computer, mobile app or room device

[Click here to join the meeting](#)

Meeting ID: 296 725 794 450

Passcode: zJBS9a

[Download Teams](#) | [Join on the web](#)

Or call in (audio only)

[+1 860-241-5459,,723458215#](#) United States, Hartford

Phone Conference ID: 723 458 215#

[Find a local number](#) | [Reset PIN](#)



Connecticut State Colleges & Universities

[Learn More](#) | [Help](#) | [Meeting options](#) | [Legal](#)



New Employee Orientation Information

Overview

New employee orientation is typically held on an employee's first day, which aligns with the first day of a pay-period. The orientation provides an overview of the [CSCU structure](#), [human resources](#), [payroll](#), [benefits](#), [IT support](#), and [policies](#), as well as Title IX and diversity training.

Orientation is virtual and attendees will receive a link to attend a week prior to the scheduled start date. The schedule is 9 a.m. – 3:30 p.m. Supervisors and new employees should discuss first day logistics for participation. Please note, if there is a low number of anticipated attendees, the orientation may be postponed until the following pay period.

Important Note Regarding Health/Retirement Selection: While you have 31 days after your date of hire to elect health and dental benefits, you must elect a retirement plan on or before your first date of employment. Attending one of the following [benefit](#) and [retirement](#) sessions will help educate you on the options available.

The [benefits sessions](#) review [healthcare plans](#) and [supplemental benefits](#). Topics include plan options, qualifying events, eligible dependents, how to use self-service in [Core-CT](#) as well as answer live questions from participants. Links on the [State - Care Compass website](#) will be reviewed.

The [retirement sessions](#) review the [retirement plans](#), eligibility requirements, application process, answer most FAQs and live questions from participants.

Other useful sites include the following:

[Supplemental Information](#) – As a state of Connecticut employee, benefits extend beyond health and retirement. This link explains the various supplemental benefit that may be available to you as a state employee, and a [guide](#) is available as well.

[HR Payroll Schedule and Other Forms](#) – This website hosts the pay schedule, lists of holidays, and other useful forms. Please note that new employees will receive the first paycheck four weeks from the date of hire.

[Labor Contracts](#) – Many of our positions are associated with a labor union. This site contains the agreements for each union. Non-represented employees can visit the [CSCU Policy for Management and Confidential](#) as a resource.

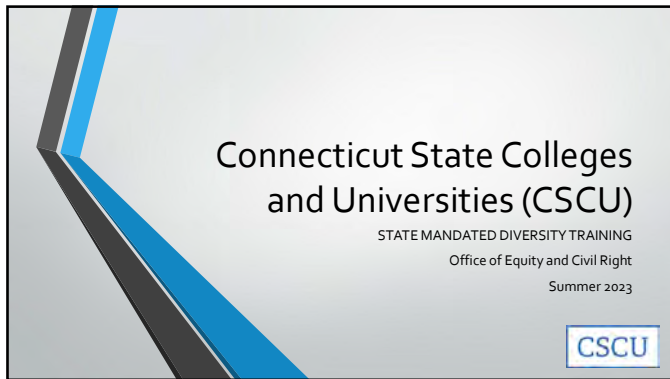
[Employee Enrollment Form for Emergency/Weather Notifications \(For Multiple Locations Only\)](#) – Notification of closings or emergencies that occur on campus are managed through the Everbridge Emergency System. If employees will be working at multiple locations, this link may be used to update your notification preferences.

Welcome aboard!



New Employee Orientation Schedule

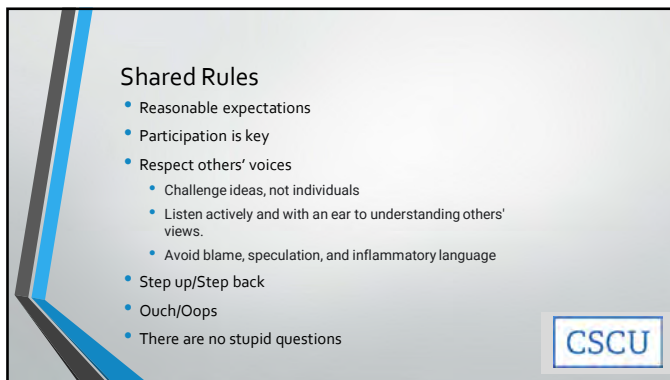
9:00 – 9:30 am	HR Presentation	Human Resources
9:30 – 10:00 am	Payroll	Payroll Representative
10:00 - 10:30 am	Benefits	Benefits Manager
10:30 – 10:45 am	Break	
10:45 – 11:00 am	Title IX	Virtual Presentation
11:00 - 11:30 am	IT	IT Representative
11:30 - 12:00 pm	Union	Union Representatives
12:00 -1:00 pm	Lunch Break	
1:00 - 3:30 pm	NEOGOV/Policies Diversity Training	ECR Team



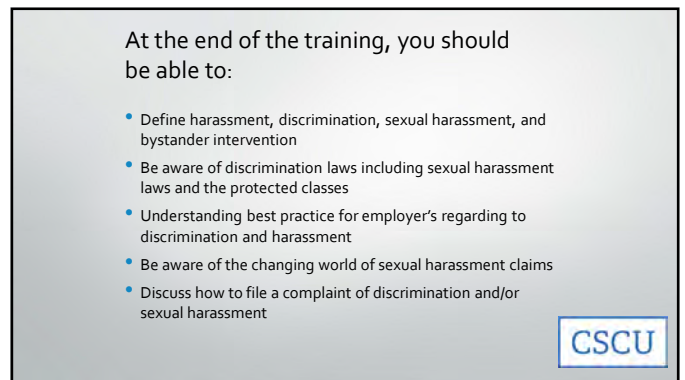
1



2



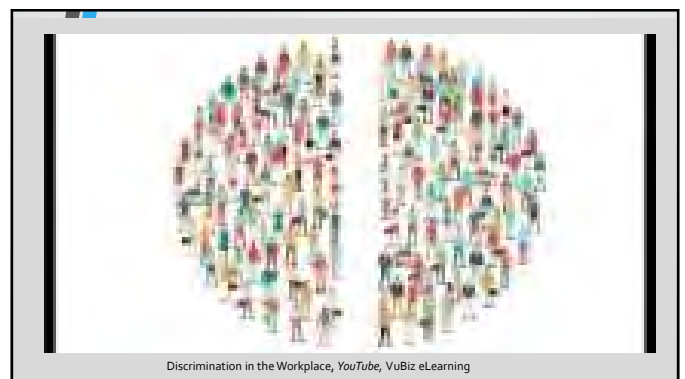
3



4



5



6

Title IX of the Education Amendments of 1972

December 11, 1979 – The Office for Civil Rights (OCR) issued a policy interpretation that outlines three (3) ways an institution can prove it is in compliance with Title IX:

- Providing participation opportunities that are substantially proportionate to the student enrollment.
- Demonstrating a continual expansion of opportunities for the underrepresented sex (typically female).
- Accommodating the interest and ability of underrepresented sex.

CSCU

Hate Crime Laws

Hate crime is defined as a crime of violence, property damage, or threat that is motivated in whole or in part by an offender's bias based on race, religion, ethnicity, national origin, gender, physical or intellectual disability or sexual orientation.

CSCU

Hate Crime Laws in Connecticut

Conn. Gen. Statute § 46a-58
Deprivation of Rights, Desecration of Property, and Cross Burning.

It is a crime to:

1. deprive someone of any legally guaranteed right because of his religion, national origin, alienage, color, race, sex, sexual orientation, blindness, or physical disability;
2. intentionally desecrate any public property, monument, or structure, religious object, symbol, or house of worship, cemetery, or private structure; or
3. place a burning cross or simulation of one on public or private property without the written consent of the owner.

This is a class A misdemeanor, but it is a class D felony if there is more than \$1,000 of property damage and/or court-ordered hate crimes diversion program (education and supervised community service).

Conn. Gen. Statute § 53-37
Prohibits ridicule on the basis of creed, religion, color, denomination, nationality or race.
Punishable by fine and/or prison.

Conn. Gen. Statute § 53-37a
Deprivation of a Person's Civil Rights By Person Wearing Mask or Hood

Penalties are increased for the crimes involving depriving someone of his constitutional rights, desecrating property, or burning a cross under certain circumstances if the person:

- (1) commits the crime while wearing a mask, hood, or other device designed to conceal his identity and
- (2) intends to deprive another person of any legally guaranteed right because of his religion, national origin, alienage, color, race, sex, sexual orientation, blindness, or physical disability. *This is a class D felony.*

CSCU

Hate Crime Laws in Connecticut

Conn. Gen. Statute § 53-37b
Prohibits use of force or threat with intent to deprive a person or class of persons of equal protection or privileges and immunities under State and Federal law. Includes:

- a.) Intentionally placing or attempting to place another in fear of imminent serious physical injury.
- b.) Threatening to commit a violent crime with intent to terrorize, cause evacuation of a physical space or cause serious public inconvenience.
- c.) Threatening to commit a violent crime in reckless disregard of the risk of causing terror or inconvenience.

Punishable by fine and/or prison as a misdemeanor or felony (causing bodily injury: 1 to 10 years prison; up to \$10,000 fine; causing death: 1 to 20 years prison; up to \$15,000 fine.)

Public Act 08-49
AN ACT CONCERNING HATE CRIMES

(d) Any person who places a noose or a simulation thereof on any public property, or on any private property without the written consent of the owner, and with intent to intimidate or harass any other person on account of religion, national origin, alienage, color, race, sex, sexual orientation, blindness or physical disability, shall be in violation of subsection (a) of this section.

CSCU

Public Act 00-72

Prohibits intimidation based on bigotry or bias for malicious acts and with intention to intimidate or harass on account of race, religion, ethnicity, or sexual orientation, including:

- a.) Causing serious physical injury to another person (first degree offense).
- b.) Causing physical contact with the victim (second or third degree offense).
- c.) Damaging, destroying or defacing the victim's property (second or third degree offense).
- d.) Threatening to do either of the above, with reasonable cause to believe threat will be carried out. (second or third degree offense).
- e.) Urging another person to do such acts (third degree offense).

Punishable as a felony by prison and/or fine.

Public Act 00-72 also stipulates higher sentences for persistent offenders who are convicted of hate crimes for a second time. The law also enables a person injured by intimidation based on bigotry or bias to sue for damages.

Public Act 00-72 requires local (town) or state troopers to monitor, record and classify all hate crimes as defined in Public Act 00-72 (intimidation based on bigotry or bias), and report data to State Police who must monitor, record and classify hate crimes. Also, a Hate Crimes Advisory Committee in the Office of the Chief of State's Attorney to coordinate efforts re: enforcement of hate crime laws, hate crime reporting, and community education programs, and to make recommendations concerning the training of police officers re: hate crimes. Also requires state and municipal police to have training re: hate crimes.

CSCU

Hate Crimes (Federal)

Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act

- October 28, 2009, President Obama signed into law
- It also creates a new federal criminal law which criminalizes willfully causing bodily injury (or attempting to do so with fire, firearm, or other dangerous weapon) when:

(1) the crime was committed because of the actual or perceived race, color, religion, national origin of any person or (2) the crime was committed because of the actual or perceived religion, national origin, gender, sexual orientation, gender identity, or disability of any person and the crime affected interstate or foreign commerce or occurred within federal special maritime and territorial jurisdiction.

<https://www.justice.gov/crt/matthew-shepard-and-james-byrd-jr-hate-crimes-prevention-act-2009-9>

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Protected Classes

- Marital status
- National Origin
- Physical disability
- Race
- Religion/Religious/Creed
- Retaliation
- Sex (including pregnancy, transgender status, sexual harassment)
- Sexual orientation
- Veteran Status
- Disability:
 - Mental disability
 - Learning disability
 - Guide Dog (access)
 - Intellectual disability
 - Failure to accommodate due to Disability

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Protected Classes

- **Age (Federal 40+)**
- Alienage
- Ancestry
- **Breastfeeding**
- **Color**
- Criminal Record (state employment and licensing only)
- Members of Civil Air Patrol
- Familial Status, responsibility, or planning
- **Gender Identity or Expression**
- **Genetic Information (employment)**
- Lawful source of income (housing and public accommodations)
- Victims of Domestic Violence

Bold = Federally protected/State Protected

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Retaliation for Protected Activity

- Retaliation against an individual for filing a complaint or charge of discrimination, participating in an investigation, or opposing discriminatory practices.
- An employer may not fire, demote, harass, or otherwise retaliate against an individual for reporting or filing a charge of discrimination, participating in a discrimination proceedings or otherwise opposing discrimination.

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It is illegal to discriminate in any aspect of employment

Covered acts of employment include:

- Hiring and firing
- Compensation, assignments or job classifications of employees
- Transfer, promotion, layoff, or recall
- Job advertisements, testing, and recruitment
- Use of company facilities
- Training and apprenticeship programs
- Fringe benefits
- Salary or Pay
- Retirement plans and disability leaves
- Other terms & conditions of employment

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Discrimination Differential Treatment

- Treating someone differently
- Based on individual's protected class status
- Interferes with or limits the ability of a person to participate in, or benefit from, the services, activities or privileges provided by the institution
- Otherwise adversely affect the person's employment or educational experience and/or creating a hostile learning or working environment

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Discrimination Disparate Impact

- A process, procedure or action that results in adverse impact towards members of a protected class.
- An action may not appear to be discriminatory on its face, but rather is one of discrimination based on its application or effect.

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Disparate Impact – Case Law

Griggs v. Duke Power Company

- Issue: Using a high school diploma and entry exams as a requirement for some clerical or entry level work
- Data: 32% White men versus 12% Black men with HS diploma (disparate impact)
- Employer (defendant) was unable to defend link between the position and educational requirement

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Discrimination Hostile Environment

- **Unwelcome** verbal or physical conduct directed at another
- Because of that individual's **protected class** (e.g., gender/sex)
- That **unreasonably** interferes with the person's work or academic performance
- Sufficiently **severe, pervasive or persistent**
- Purpose or of creating a hostile work or educational environment
 - A one-time incident can be seen as severe

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Examples of Harassing Behavior

- Language/posters with of a prejudicial nature
- Offensive graphic jokes
- Taunting
- Name calling
- Use of offensive words
- Threatening
- Unlawful or inappropriate Internet use
- "Accidental" collisions or brushing up against
- Physical assault including sexual assault

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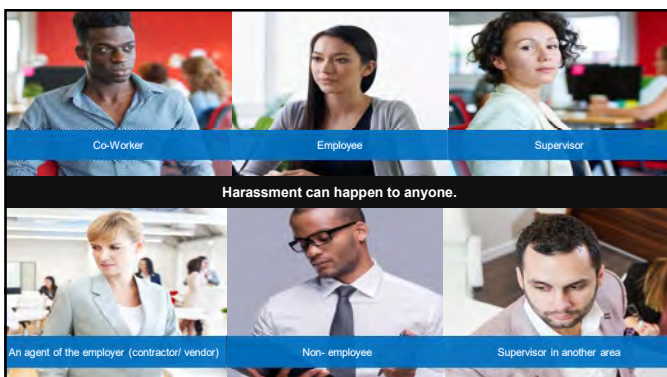
21

What Makes an Environment Hostile?

- Consider whether it is severe, persistent, or pervasive...
 - Does the conduct interfere with employees' work performance?
 - Concentration, avoiding the person, missing work
 - Is the conduct threatening or humiliating?
 - Jokes at others' expense, demeaning comments
 - What is the nature of the conduct?
 - Is this based on a protected class status (e.g., race, sexual orientation)
 - How frequent is the conduct?
 - Usually occurs more than once over time; however, a one-time occurrence can be a violation (e.g., hate crime, threats of violence)

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What is Sexual Harassment?

Illegal Sexual Harassment is defined in Conn. Gen. Stat. §46a-60(b)(8) as:

Any **UNWELCOME** sexual advances or request for sexual favors or any conduct of a sexual nature when:

- A. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment,
- B. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or
- C. Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

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Quid Pro Quo???? This for That

When someone in a position of power offers a benefit in exchange for sexual attention or threatens your job if you refuse their sexual attention, that is *quid pro quo* sexual harassment.

Examples:

- Subjected to **unwelcome** requests for favors or conduct when:
 - Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment/education;
 - Submission to or rejection of such conduct by an individual is used as the basis for employment/education/academic decisions affecting such individual;
- The harasser generally has some type of supervisory or power relationship over the person being harassed

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Quid Pro Quo

- Job Benefits are Conditional
- One Incident is All It Takes
- Different Levels of Authority

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Hostile Work Environment –

- A **co-worker, supervisor, or third-party** makes repeated inappropriate, and unwanted sexual advances, comments, or requests (protected class gender/sex)
- Includes widespread sexual favoritism
- May be verbal, physical, or visual
- Behavior is sufficiently **severe, pervasive or persistent**
- Behavior **unreasonably** interferes with the person's work or academic performance
- Purpose or of creating a hostile work or educational environment
 - **A one-time incident can be seen as severe**

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Sexual Harassment Not Limited to Male/Female interactions

Patino v. Birken Mfg. Co., 304 Conn. 679 (2012)

CT Supreme Court find Employers Liable for Anti-Gay Harassment and awards \$94,500 "garden variety" emotional distress

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Where Can Harassment Happen?

Any place a student/employee must be as part of their education/employment:

- At the workplace
- In the cafeteria
- Work related travel/events (on and off campus)
- On social media
- Through text messages
- Literally Anywhere!!

Misconduct can also be investigated when it occurs during unpaid breaks (lunch), campus sponsored social events and at "company" parties (picnics, retirement and holiday parties, happy hours, etc.)

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What is an Employer Legally Liable for?

- Conduct of its supervisory staff
 - Negative employment action
 - Hostile environment created unless can be proved care was taken to eliminate this
- Conduct of non-supervisor employees if it knew or should have known of the conduct and failed to take prompt and effective corrective action
- Conduct of an employer's agent

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Can an Employee be Personally Liable

- Yes...
 - For Discrimination/Harassment
 - For Retaliation
 - For Aiding or Abetting

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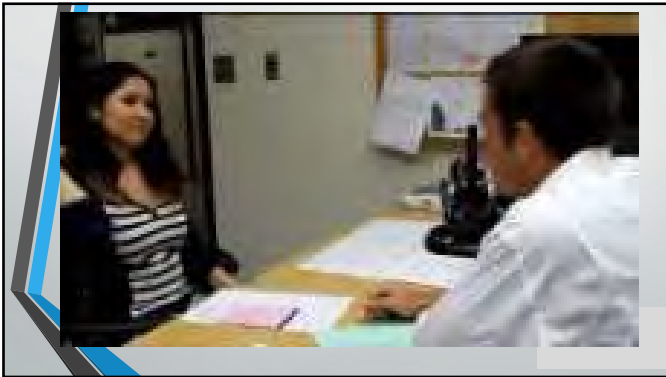
31

Risks Associated with Harassment and Discrimination

- Low Morale
- Increased Turnover
- Loss of Productivity
- Financial Loss
- Job Loss
- Negative Public Attention
- Etc.....

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Scenario 1 (polling):

Chao and Mai, Vietnamese refugees who resettled in the local area, have been employed at the University as maintenance workers for several years. About a month ago, shortly after a new supervisor took over the department, Chao and Mai were told that they should no longer speak their native language to each other at work, even while on break. Since that time Chao and Mai have been reprimanded for returning late from lunch and their supervisor has been watching them throughout their shift.

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Is this a policy violation?

1. Yes
2. No
3. Unsure

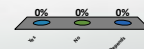


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Can an employer require employees to only speak English?

1. Yes
2. No
3. Depends



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What is the protected class status?

1. Sex
2. Race
3. National Origin
4. Religion
5. Color



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Preventing Harassment Training (Small-Groups)

10 Minute Case Study Activity



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Scenario 1 - (break-out)

A faculty member pursues and engages in a romantic/physical relationship with a student.

- Is this a violation of our policy?
- If no, when might this become a violation?
- Does it matter if the student is currently taking a class with this faculty member?

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Scenario 2 (break-out):

A student reported to you that a faculty (you and this faculty member are close peers) made racist comments/jokes about Hispanics. Including mocking accents, saying you should speak English in this country, and negative comments about the migrants at the Texas/Mexican border.

- What would you do in this situation?
- Is this a potential violation of our policy?
- What would you tell the student regarding their allegations?

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Scenario 3 (break out):

While teaching a section on African Art you display the following image and ask students what they think of the image. A student states that the image "looks like a monkey." Some students in the class laugh at the response and some Black students look upset.



- What are your thoughts about this comment?
- How might you respond to this situation?
- What happens if the faculty member moves on without addressing the comment?

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Creating a Campus of Inclusion

- Understanding the bystander effect
- How to be allies in this work

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What is the Bystander Effect?

Bystander Effect: Phenomenon within social psychology that describes how people are less likely to offer help to a victim when others are present.

- Five Step Process to Intervening
 - Notice that something is wrong
 - Define the situation as an emergency
 - Decide whether they are personally responsible to act
 - Choose how to help
 - Implement the chosen helping behavior

Kitty Genovese: Charlotte Ruiz, Simply Psychology April 10, 2011

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Bystander intervention strategies for witnesses to harassment.

- Prepare and practice phrases you're comfortable using to question hurtful or discriminatory language and behavior.
- Subtle strategies to defuse a situation. Take the focus off the target and shift them to you and what you're saying.
- Allyship. Using your privilege to intervene when you see someone in a marginalized group being harmed. Recognizing that your gender, race, age, or other characteristics may put you in a position that makes it easier for you to speak up.

Bystander Intervention What to do if you Witness Workplace Harassment, Lakshmi Hutchinson, April 13, 2021

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CSCU Policies

- BOR/CSCU Statement of Title IX Policy
- Affirmative Action Policy Statements
- Consensual Relationships Policy
- Sexual Misconduct Reporting, Supporting Measures & Processes Policy
- Use of Gender Identity and Pronouns Policy
- Policy on Access to Locker Rooms and Restrooms

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CSCU PERSPECTIVE HARASSMENT AND DISCRIMINATION

- It's illegal—Title VII of the Civil Rights Act, state law and Title IX of the Education Enhancement Act.
- It won't be tolerated.
- It creates personal financial liability, loss of reputation, possible loss of employment and possibly criminal charges.

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Colleges are required...

- To take all complaints seriously
- To publish their procedures for complaint handling
- To publish the name and contact information for the person responsible for receiving complaints
- To follow up on complaints in a timely manner

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Reporting Discrimination & Harassment

- Encourage reporting as soon as possible
 - If you are the target of unwanted attention or behavior, document specifics of the incident, and report it.
 - Administrators and supervisors **must** report incidents of discrimination/ harassment
- Students and non-supervisory employees are strongly encouraged to report incidents of discrimination and/or harassment (different standard for Title IX)
- **All employees must** report incidents of sexual misconduct (including sexual harassment), stalking or intimate partner violence and/or gender discrimination to the Title IX Officer

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How do I file a complaint?

Procedure for Filing a Discrimination Complaint
(CT State Colleges and Universities (CSCU))

1. Request a meeting with the Equity and Civil Rights, who will advise you of your rights in accordance with relevant laws and propose possible remedies
2. You have the right to file a written complaint
3. The written complaint should be filed on the complaint form provided by the Office of Equity and Civil Rights.
4. Where practicable, it should be submitted within thirty (30) days of the alleged discriminatory treatment

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Standards Utilized

Reasonable Person Standard

- Behavior that a reasonable person would consider offensive
- In the eye of the beholder. Impact - not intent!

Preponderance of the Evidence

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Complaint Procedures and Options*

- Internal Process: 90-day time frame
 - Complaint Procedure
- External Process:
 - CHRO (300-day timeframe)
 - EEOC (300-day timeframe)
- OCR Process: 180-day time frame
 - *ODE procedures and timetables included in packets

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Do my complainant's rights end there?

No...complainants also have the right...

- Not to be retaliated against
- To take their complaint to the State's Commission on Human Rights and Opportunities (CHRO) or the US Equal Employment Opportunity Commission (EEOC)

Retaliation for Discrimination Complaints

Retaliation for having filed or participated in a complaint or investigation of discrimination is presumptive employment discrimination and is a violation of the law. As such, retaliation for discrimination complaints will not be tolerated.

Definition of Retaliation

Disciplining, changing work assignments of, providing inaccurate work information to, or refusing to cooperate or discuss work related matters with an employee because that employee has complained about or resisted harassment, discrimination or retaliation.

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Reporting Discrimination & Harassment

- Complaints can be reported to your campus HR Generalist/or Regional HR Manager.
- Office of Equity and Civil Rights
 - Nick D'Agostino, Director of Equity and Civil Rights
 - ndagostino@commnet.edu
 - 860-713-0727
 - Rebecca Cannon-Klemenz, EEO Specialist
 - rcannonklemenz@commnet.edu
 - 860-713-0334
 - Kimberly Carolina, Equity and Civil Rights Senior Investigator & Compliance Manager
 - kcarolina@commnet.edu
 - Marilyn Albrecht, Title IX and Civil Rights Investigator
 - malbrecht@commnet.edu

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Reporting Discrimination & Harassment

- Complaints can be reported to your campus HR Generalist/or Regional HR Manager.
- Office for Equity & Inclusion
 - Jill Bassett-Cameron, Ed.D., Senior Equity & Inclusion Officer/Title IX Coordinator
 - jbassett-cameron@cscu.edu

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Reporting Discrimination & Harassment

- Complaints can be reported to your campus HR Generalist/or Regional HR Manager.
- Southern Connecticut State University
 - Diane Ariza, VP of Diversity and Equal Employment
 - arizad1@southernct.edu
 - arizad1@southernct.edu
 - 203-392-8377
 - Paula Rice, Director of EEO
 - ricep1@southernct.edu
 - 203-392-5568

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Reporting Discrimination & Harassment

- Complaints can be reported to your campus HR Generalist/or Regional HR Manager.
- Eastern Connecticut State University
 - LaMar Coleman - VP of Equity and Diversity
 - colemanla@easternct.edu
 - 860- 465-0072

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Reporting Discrimination & Harassment

Complaints can be reported to your campus HR Generalist/or Regional HR Manager.

- Western Connecticut State University
 - Jesenia Minier- Title IX Coordinator and Chief Diversity Officer
 - minierj@wcsu.edu
 - 203-837-8444

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Commission on Human Rights and Opportunities (CHRO) Information

Commission on Human Rights and Opportunities
Toll Free 1- (800) 477-5737
TDD (860) 541-3459
www.ct.gov/chro

Capital Region Office
439 Columbus Blvd.
Hartford, CT 06103
Tel: (860) 566-7720
TDD (860) 566-7720

Southwest Region Office
339 Fairfield Avenue
6th Floor
Bridgeport, CT 06604
Tel: (203) 579-6246
TDD (203) 579-6246

Eastern Region Office
300 Broadway
Norwich, CT 06360
Tel: (860) 886-5703
TDD (860) 886-5707

West Central Region Office
Rowland State Government Center
55 West Main Street, Suite 210
Waterbury, CT 06702-2004
Tel: (203) 805-6530
TDD (203) 805-6529

Complaints should be filed with the Commission on Human Rights and Opportunities
no later than one hundred and eighty (180) days after the alleged act of employment discrimination occurred.

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US Equal Employment Opportunity Commission (EEOC)

US Equal Employment Opportunity Commission
John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203
Phone: 1-800-669-4000
TTY: 1-800-669-6820 Fax: 617-565-3196

Office Hours: Monday - Friday from 8:30 a.m. - 5:00 p.m.
Intake Hours: Monday - Friday from 8:30 a.m. - 3:00 p.m.

It is encouraged that you to call the 800 number listed above for information, and pre-screening by an intake information representative before you visit the office.

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re: Diversity Training - June 14, 2024

Cannon-Klemenz, Rebecca <rebecca.cannonklemenz@ct.edu>

Fri 6/14/2024 3:30 PM

To:

 2 attachments (3 MB)

CSCU Diversity Training-Summer2023.pptx; training list.png;

Dear Colleague:

Thank you for attending today's training. Please find below a list of links to important CSCU policies and state and federal civil right agencies.

Equal Employment Opportunity Center of Excellence

<https://www.ct.edu/hr/diversity>

Affirmative Action Statement (Non-Discrimination Policy)

 [Affirmative Action Policy](#)

Sexual Misconduct Reporting Policy

 [Sexual Misconduct Policy](#)

Statement of Title IX

 [Title IX](#)

Complaint Procedure

 <https://www.ct.edu/files/pdfs/Procedures%20for%20Staff%20Complaints%2011-9-20.pdf>

CSCU Legal Affairs - Title IX

 <https://www.ct.edu/legal/title9>

Use of Preferred Name Policy

 [Preferred Name](#)

Consensual Relationship

 [Consensual Relationship](#)

Use of Gender Pronouns Policy

 [Preferred Pronouns](#)

Connecticut Commission on Human Rights and Opportunities

<https://portal.ct.gov/CHRO>

U.S. Equal Employment Opportunity Commission

<https://www.eeoc.gov/>

Thank you and we look forward to meeting with you soon.



Rebecca Cannon-Klemenzen, Senior Investigator and Compliance Specialist, Office of Equity and Civil Rights, Certified ADA Coordinator and Mediator.

(T) 860.723.0334, (F) 860.723.0080

Rebecca.cannonklemenzen@ct.edu



re: NEOGOV tutorial

Cannon-Klemenz, Rebecca <rebecca.cannonklemenz@ct.edu>

Fri 6/14/2024 3:30 PM

To:

Dear Colleague:

Thank you for attending the first half of the three (3) hour State Mandated Diversity Training. As such, you are now required to complete the one (1) hour online module *Understanding and Preventing Microaggressions* through NEOGOV.

In this module you will:

- Learn about microaggressions so you can understand how they are connected to implicit bias.
- Learn how to apply a set of techniques to help you confront your own implicit biases and respond in the moment to microaggressions.

Please use the following link to access the module.

<https://login.neogov.com/signin?siteCode=LMS>.

A step by step tutorial is attached to facilitate your enrollment in this course.

Please feel to reach out to me should you have any issues of concern.

Thank you.



Rebecca Cannon-Klemenz, Senior Investigator and Compliance Specialist, Office of Equity and Civil Rights, Certified ADA Coordinator and Mediator.

(T) 860.723.0334, (F) 860.723.0080

Rebecca.cannonklemenz@ct.edu



NEOGOV Tutorial

Troubleshooting, Logging In, and Course Enrollment Instructions

If you have never previously used NEOGOV, please reach out to Rebecca Cannon-Klemenz at rcannonklemenz@commnet.edu to register you for NEOGOV and/or send you an activation email.

If you have previously used NEOGOV and remember your log in information, please go to Step 5 to enroll yourself into your desired course.

If you have previously used NEOGOV and have forgotten your password, please go to Step 1 and follow the instructions below to reset your password. ***USER TIP: Your username is typically your state issued CSCC/CSCU email address.**

1. Go to: <https://login.neogov.com/signout?logoutType=1&siteCode=LMS>. Please log in if you know your username and password. If you do not know it, please select “forgot your username or password.”

The screenshot shows the NEOGOV login interface. At the top, the URL is login.neogov.com/signin?siteCode=LMS. The form includes a 'Username' field containing 'rcannon@commnet.edu' and a 'Password' field with masked characters. Below the password field, it states 'All fields are required'. A 'Log In' button is present, and a link 'Forgot your username or password?' is located directly beneath it. A black arrow points to this link.

2. Please follow the instructions for resetting your username and password.

The screenshot shows the 'Login Assistance' page on NEOGOV. At the top, the URL is login.neogov.com/resetpassword. The page features a 'Back to Login Page' link and a message: 'If an account matching rcannon@commnet.edu is registered with us, a username/password request will be sent shortly. Please check your spam or junk folder if you don't see the email in your inbox.' A black arrow points to this message.

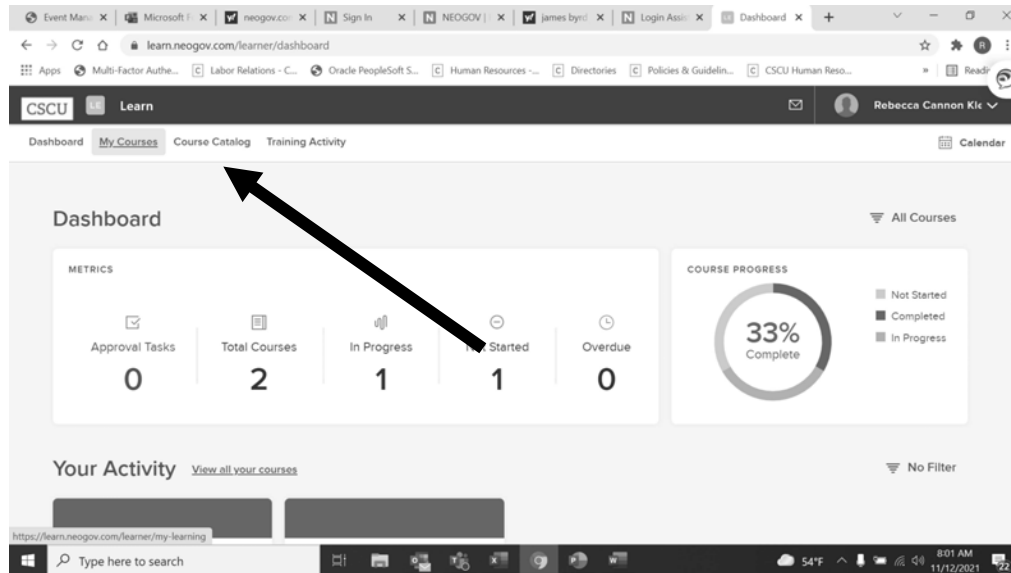
NEOGOV Tutorial

Troubleshooting, Logging In, and Course Enrollment Instructions

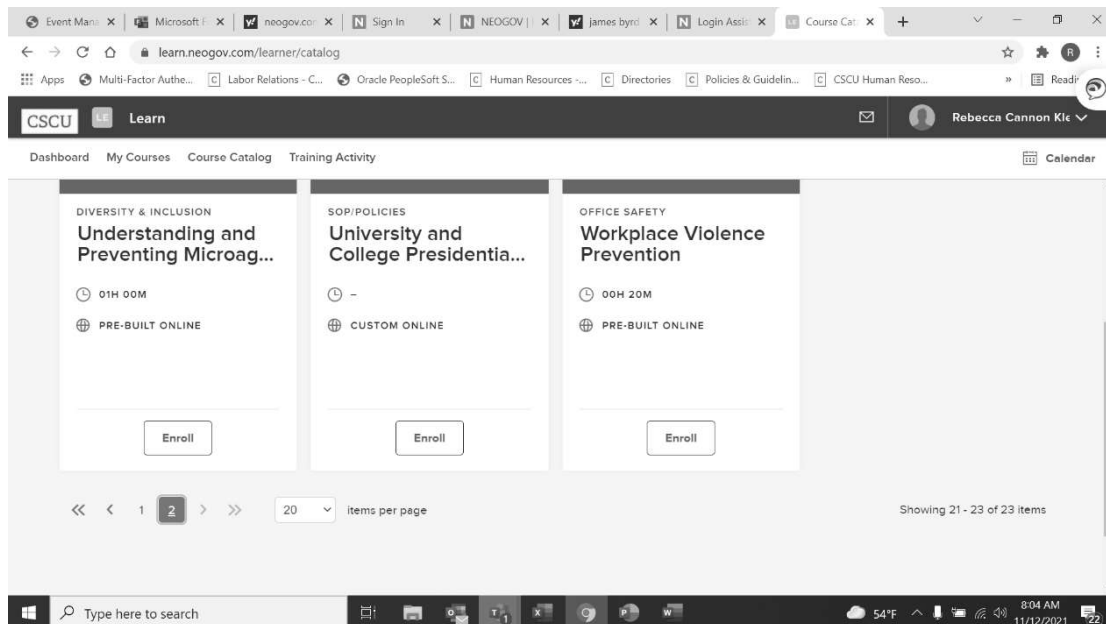
3. Please go to your CSCC/CSCU email account and follow the instructions to reset your password.
4. Once your password is reset, go back to NEOGOV and log in.

<https://login.neogov.com/signout?logoutType=1&siteCode=LMS>.

5. Once logged in please go to course catalog.



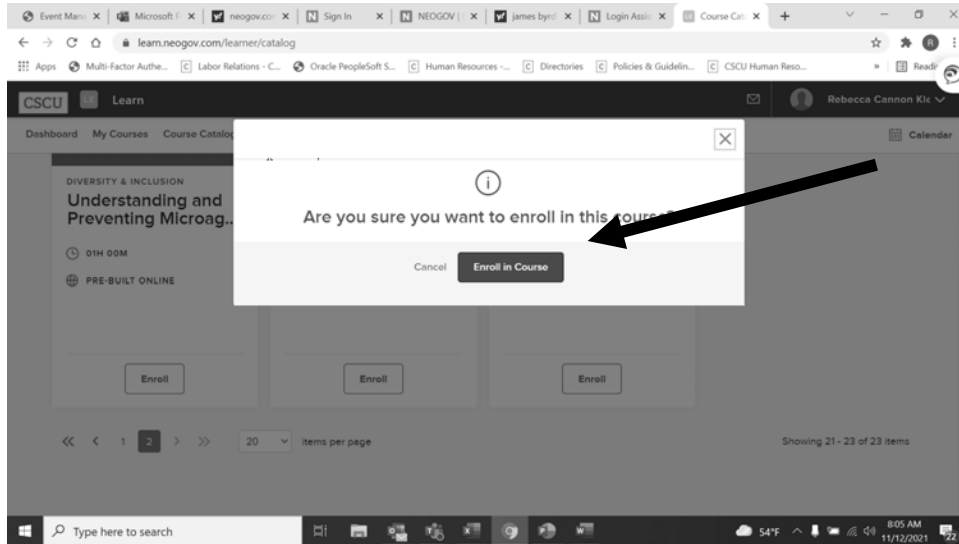
6. Scroll down through page 1 or 2 and find the course you have been instructed to complete. E.g. ***Understanding and Preventing Microaggressions, Bias in Interviewing, or Harassment Prevention for Connecticut Employees***



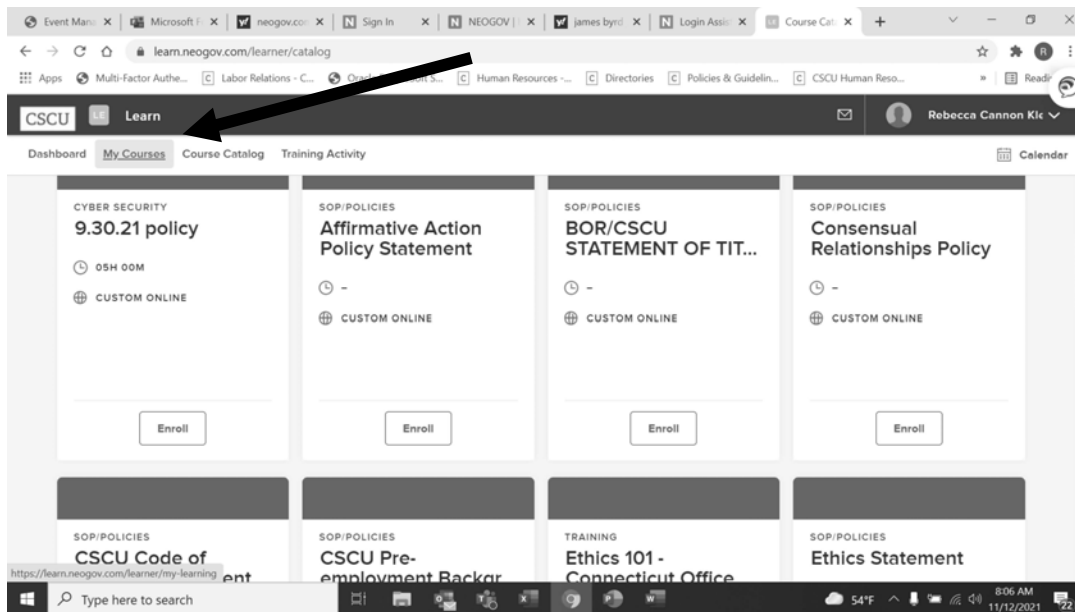
NEOGOV Tutorial

Troubleshooting, Logging In, and Course Enrollment Instructions

7. Select the “Enroll” button to enroll yourself in course. (You may get an alert that states you must request approval for this course, please select “yes, select approval”, and it will still enroll you in the course)



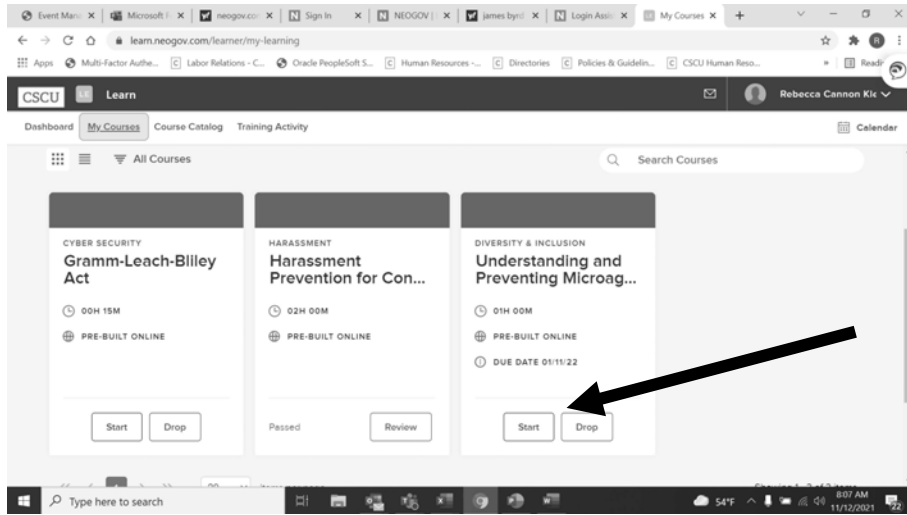
8. Then go back to “My Courses”.



NEOGOV Tutorial

Troubleshooting, Logging In, and Course Enrollment Instructions

9. Select “start” and complete at your convenience.





1

Overview

Connecticut State Colleges and Universities has a strong commitment to diversity, equity, and inclusion.

CSCU strives to cultivate an environment that is equitable, inclusive, and respectful to enable students, faculty, and staff to realize their full potential.

The search process plays a significant role in accomplishing these objectives.

Employment actions, including all aspects of the search process, are guided by Affirmative Action/Equal Employment Opportunity policies and practices, as well as provisions of various collective bargaining agreements.

To align the search process with our equity pillars, the process includes oversight to ensure that equal employment opportunity and equity are at the forefront of this work.

2

Confidentiality

- Confidentiality is critical.
- The Search Committee will be asked to sign a Confidentiality Agreement prior to participating in the process.
- Committee meeting discussions and applicant materials are strictly confidential and should not be shared with individuals outside of the search committee, hiring manager, and human resources.
- Freedom of Information (FOIA)
- Conflicts of Interest

3

Unconscious Bias

- Before you begin reviewing applications, you are required to complete the online training, *Bias in the Interview*.
- Be sure to also review the Unconscious Bias document included in your invite to the charge.

- We all come to the table with positive and negative biases, stereotypes, and assumptions. Ask yourself why you are favoring or eliminating a candidate.
- Remind yourself that when we hire someone with a different background and mindset, we increase creativity and different approaches to problems and projects.

4

Committee Member Overview

The responsibility of the Search Committee is to identify top candidates to recommend to the Hiring Manager. It is imperative that the committee be available to attend the bias training, search charge and to conduct interviews. Committee members should work together to ensure that candidate review and recommendation is based on AA/EEO principles.

- Maintain confidentiality of all information in the search process
- Complete online bias training and attend a search charge
- Actively recruit candidates to the position utilizing professional networks
- Attend committee meetings and support the work of the committee.
- Develop interview questions and scoring method to evaluate candidates.
- Understand and apply AA/EEO principles in your review.
- Evaluate candidates fairly; be mindful of implicit bias and cultural norms.
- Review all candidates, similarly, giving equal time and consideration to all.

5

Search Chair Overview

The Search Chair is responsible for facilitating the search process through committee organization, engaging in candidate evaluation, and maintaining compliance with AA/EEO principles. The Search Chair should ensure timely scheduling of meetings and interviews, and exchange of information necessary to perform the work of the committee.

In addition to the general search committee responsibilities, the Search Chair:

- Facilitates the work of the committee; keeps hiring manager apprised of progress.
- Ensures drafting of job-related, open-ended interview questions.
- Ensures drafting of rubric or set of standards for evaluation of qualifications that are objective and measurable.
- Ensures committee discussions are respectful and support the commitment to diversity and inclusion.
- Directs applicants needing Reasonable Accommodation to Human Resources for assistance.
- With committee input, completes required forms to provide justifications for the committee's decisions and recommendations for ECR review and approval.

6

Step 1: Committee Meetings

Coordinate search schedule:

- What dates and times are we planning to meet to...
 - Draft interview questions and preferred responses
 - Review applications to determine qualified applicants to interview
 - Interview qualified applicants
 - Meet as a committee to agree on candidate(s) to recommend to Hiring Manager.
 - Submit Strengths/Weaknesses

✓ Remember to document all decisions for the file.



7

Job Description

vs

Job Announcement

- A written narrative that describes the general tasks and essential functions, or other related duties and responsibilities of a position.
- Establishes a solid set of expectations for employers to communicate to their employees.
- Expectations for employees also helps employers properly evaluate performance.
- Generally, more detailed than the job announcement.



- Describes the position information including the title, salary, duties, qualification requirements, closing date, and application procedures.
- First point of contact that a new employee makes.
- Add preferred qualifications that are an extension of the minimum requirements.
- Should be quantifiable qualifications that the committee can use as guidelines for applicant review.

8

Step 2: Developing Interview Questions/Preferred Responses

While the position is posted, the committee will create interview questions and preferred responses. The Search Chair will submit the questions to the Recruitment Specialist for ECR approval. It is recommended to have questions approved prior to the positions closing date, so that the committee can begin to review resumes immediately following the closing.

9

Interview Questions and Preferred Responses

Interview questions provide search committees the ability to:

- Quantify knowledge, skills, and abilities (KSAs) to identify which candidates can fulfill the essential functions of the position
- Address key priorities in the field/work/duties
- Must include at least one question related to Diversity/Equity: To identify candidates' ability to work within a diverse environment (e.g., race, experience, socio-economic, disability, gender, sexual orientation, religion, etc.)

The Questions Must...

- Be intentional and purposeful
- Reflect the job duties/description
- Have quantifiable responses that can be evaluated across candidates
- Be both technical and experiential
- Be open ended
- Be free from bias

Why the Preferred Answers Matter?

- Minimize bias in the interviews by evaluating a candidate based on their KSAs and not on their being a good *fit*
- They provide measurable and quantifiable answers for each interview question
- Are written to satisfy the KSAs
- Are directly related to the question asked
- Establish an equitable criteria for all candidates

10

How to Build the Question

- The most important part of the process is to review the job description and correctly identify the essential functions of the position
- Identify the KSAs that are necessary to fulfill each essential function
- Develop open ended questions to determine if a candidate possesses the necessary KSAs to fulfill the essential functions
- Use situational based questions to capture soft skills needed for the position
- Where practicable, incorporate opportunities for candidates to include examples of their experience(s) as it relates to the position

11

How to Build a Preferred Answer

- Put yourself in the shoes of the interviewee
- Consider what do you hope to gain by asking the question
- Create a bulleted list of the responses that you are specifically looking for in meeting the KSAs. Be as specific as you can be!
- Convert the list into quantifiable and measurable responses – remove subjectivity
 - Ex: Tell us your definition of diversity.
 - Poor response:* candidate discusses diversity.
 - Preferred response:* Candidate provides at least four identities in their response (e.g., race, religion, socio-economic, disability, gender, sexual orientation, first generation, veteran).

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Example:

Veterans Services Associate

- **Essential Function:** Coordinate with appropriate college departments for testing, academic advising, financial aid, campus life, and student support services and other departments for the success and retention of veteran students.
- **KSAs:** Collaboration, experience/knowledge of college departments that directly impact outcomes for student veterans, understanding of complex needs for veterans.
- **Question:** Please tell us about your experiences working collaboratively with individuals in different departments on campus, and why those collaborations are necessary, critical, and relevant to student veterans support services.
- **Preferred answer:** A. Candidate will identify at least four (4) appropriate departments such as: Bursars (payment issues, compliance reviews), Registrars (withdraws and drop deletes), Admissions (submitting paperwork), Financial Aid (required documents), Institutional Research (veteran data and reporting), Academic divisions (early intervention, raising awareness concerning consequences of withdrawals, referrals for counseling, etc.); Academic Advising (curriculum checks); Counseling (crisis intervention); Retention services (probation/suspension consequences)
- B. Candidate will demonstrate understanding regarding reasons for those collaborations by discussing at least two (2) of the following: advising new veterans or guard members on steps involved in enrollment; processing of GI Bill Educational Benefit and VA Tuition Waivers, verification of course selections, awareness of scholarships, personal counseling, academic probation/course withdrawal policies.

13

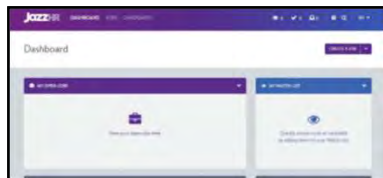
Step 3: Application Review

- Once applicants are released, the Search Committee must begin the process of reviewing the applications to determine who will be invited for an interview. All members of the Search Committee must participate in the application review.
- Search committee members must disclose how and to what extent they know a candidate. Based on this disclosure it may be best to discuss with your recruiter how to best handle this relationship.
- A review of **all applications** is necessary to determine if they meet the minimum and preferred qualifications.
- Applicants should be screened based on their meeting or not meeting the required and preferred qualifications.
 - Candidates who do not meet **all required qualifications** cannot move forward to interview, including the **must have requirements**. This would be the area that states "Candidate must possess" ...
 - Internal candidates should be held to the same standards
- This is a paper review – application compared to job specifications (required, desired, and preferred qualifications)
- Outside knowledge of a candidate cannot be factored into this process

14

JazzHR – Applicant Review

- JazzHR is an applicant-tracking system
- The recruiter will create a JazzHR account for the committee members to review resumes
- Review applicants and submit assessment on Excel AAP-2
- Committee assessment must be specific and contain no subjective language (e.g., Candidate does not meet the degree requirement, Candidate does not have the 1 year required related experience, Candidate does not meet the community college teaching preferred experience).



15

JobAps-Classified Searches only

- JobAps is an applicant-tracking system used by DAS.
- Once applications are released by DAS, the recruiter, will provide the committee with details on how to access JobAps to review the applications.

Link to the applicants:
<https://www.jobapscloud.com/CTsearchreview.php>
Enter ID:
Password:

Shared Searches

Use the ID and Password provided to you to view the shared search results.

ID:

Password:

[View Set](#)

16

Search Committee Excel Packet

- Interview Questions and Preferred Responses
- AAP-2 Candidate Guide
- 1st Interview Schedule
- Strengths – Weaknesses 1st round
- 2nd Interview Schedule
- Strengths – Weaknesses 2nd round
- Approved Hire



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Applicant Assessment



- The Search Committee uses the Excel AAP-2/Candidate Guide worksheet to evaluate all applicants. The Committee must use criteria based on the qualifications in the position that are objective and measurable to rank the applications. The committee should discuss how items will be and should be evaluated prior to the paper review. Note that some items may be weighted more heavily than others, but all committee members must review using the same evaluation criteria. Numerical rating scales are not allowed.
- During this process, committee members review *all* application materials, including resumes, CV's, cover letters, and any required documents (e.g., portfolios).
- The committee should be vigilant in guarding against implicit bias, or any selection determination based on protected status.
- The Search Committee will meet to come to consensus regarding the applicants who will be invited for an interview.

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Pause Point 1: Applicant Pool Demographic Composition



- When practicable before the positions closes, ECR will conduct an assessment to ensure the applicant pool reflects the data related to the affirmative action plan availability data for this particular recruitment.
- If the data is not reflective, ECR will issue a Pause Point email to the appointing authority, e.g., CEO and others in the respective chain to identify the next step, e.g., continue with current pool or re-post/extend post to recruit additional candidates.

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Interview Selection

When selecting candidates for interview please consider the following:

- Follow the AAP-2/Candidate Guide narratives to determine how candidates will be eliminated:
 - Base all justifications on the job posting and the **required** and **preferred** qualifications
 - The same basis for selection must be used consistently on all applicants, e.g., meets required and 2 preferred qualifications = recommended for interview.**
- Keep in mind all notes/emails subject to FOIA
- The Chair will email the Recruitment Specialist the candidates selected to be interviewed on the 1st Interview Schedule Form.
 - Please include dates and times the committee is available for interviews (allowing at least 1 week notice for candidates). You must note if a presentation will be required.
- Once approved by ECR, the Recruitment Specialist will schedule interviews and send the final schedule to the committee. If the interviews are virtual, the Recruitment Specialist will send each candidate a confirmation link via Microsoft Teams for their chosen day/time.

20

Pause Point 2: Interview Pool Compared to Applicant Pool



- ECR will conduct an assessment to ensure the interview pool is reflective of the racial composition of the applicant pool.
- If the data is not reflective, ECR will issue a Pause Point email to the appointing authority, e.g., CEO and others in the respective chain to identify the next step, e.g., extend the search to identify additional qualified candidates, identify candidates from underrepresented racial groups that meet the minimum qualifications, or schedule a meeting to discuss strategies to increase diversity in the talent pool for similar future positions.

21

Step 4: Interview

- All applicants should be asked the same questions
- Follow up questions are strongly discouraged as these can lead to bias and/or favoritism in the process
- Same format - video vs. audio vs. in person
- Same participants - all search committee members must attend each interview
- After interview, search committee members should discuss strengths/weaknesses
 - Document the strengths and weaknesses for each candidate on the AAP-2
- Search Committee recommends 3-5 candidates to move forward to 2nd interviews, if applicable

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Strengths

Subjective	Objective/Qualitative
<ul style="list-style-type: none"> Showed familiarity with educational technology. Strong teaching demo. 	<ul style="list-style-type: none"> Showed familiarity with educational technology, especially the ways the candidate makes use of Blackboard as a teaching assessment, and communication tool. Teaching demo included specific examples of how to teach students to recognize bias in assigned readings.
<ul style="list-style-type: none"> Shared specific ways she adjusted to online teaching. Showed initiative Provided a clear response and specific examples of diversity. Exceptional teaching prompt. 	<ul style="list-style-type: none"> Shared specific ways the candidate adjusted to online teaching, especially how Blackboard was used to simulate the on-ground student experience Showed initiative (CCSU adjunct pedagogy committee). Provided a clear response and specific examples of diversity, including the importance of selecting reading material that reflects the students in her classroom. Teaching demo was exceptional and provided specific examples of how to teach students to recognize bias in assigned readings.

23

Weaknesses

Subjective	Objective/Qualitative
<ul style="list-style-type: none"> Teaching philosophy was vague Difficulty answering diversity question. Teaching demo lacked specifics. 	<ul style="list-style-type: none"> Teaching philosophy did not express a philosophy/vision as it applies to writing and reading instruction. Candidate did not discuss an interpretation of "diverse student body" beyond the candidate's expressed willingness to seek common ground with students. Teaching demo lacked specific examples of how to teach students to recognize bias in assigned readings.
<ul style="list-style-type: none"> Teaching philosophy was vague. Does not mention examples of diversity beyond ability level. Only described one type of academic support. Responses overall lacked specifics. Unprepared for teaching demo. 	<ul style="list-style-type: none"> Candidate did not discuss a teaching philosophy as it applies to reading and writing instruction. Candidate did not discuss an interpretation of "diverse student body" beyond the candidate's expressed willingness to work with students. Candidate described one type of academic support (tutoring). The candidate did not have any information prepared for the required teaching demonstration and seemed unaware that a teaching demonstration was a required part of the interview.

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2nd Interviews

2nd interviews are normally conducted within 2 weeks of the 1st interviews by the Direct Supervisor and Hiring Manager (CEO or designee i.e., Dean)

- Although 2nd interview questions do not have to be approved, we request that the Supervisor submit them to ECR & the HR Recruitment Specialist for review.
- Final interviews are conducted, and the Supervisor and Hiring Manager submits the Strengths and Weaknesses Form-Finalists of each interviewed candidate noting which candidate they would recommend hiring to ECR, and the HR Recruitment Specialist for review.
- Once recommended hire is reviewed, the Supervisor or Hiring Manager will request final approval from the CEO.

25

Pause Point 3: Second Interview Pool Compared to First Interview Pool



- ECR will conduct an assessment to ensure the second interview pool is reflective of the racial composition of the first interview pool (when applicable).
- If the data is not reflective, ECR will issue a Pause Point email to the appointing authority, e.g., CEO and others in the respective chain to identify the next step, e.g., identify candidates from first round who could also be advanced to the second round, continue with the current pool, or schedule a meeting to discuss strategies to increase diversity in the talent pool for similar future positions.

26



Remember to document everything!

27

Review - Search Committee Tasks



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Thank you for your time and for your service on this committee. Have a question or concern?

You may contact your designated Recruiter or reach out to the Recruitment Team's email at cscu-recruitmentteam@commnet.edu, where it is monitored daily.

You may also contact the Office of Equity and Civil Rights.

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ECR and Recruitment Contacts

Recruitment and Talent Acquisition HR Specialists for Recruiting & Talent Acquisition:

Sheila Antonacci
Luisa Duluc
Robert Kizer
Samantha Pugh
Aaron Marshall
Elizabeth Federico, HR Assistant
Christie Higney, Manager
Jessica Cabanillas, Director

Equity & Civil Rights

Director of Equal Employment Opportunity
Nick D'Agostino
EEO Specialist
Rebecca Cannon-Klemenz

30

Unconscious Assumptions or Bias in the Evaluation Process of Candidates and Including the Interviews

-The evaluation of candidates should be equitable, consistent and objective and based solely on the qualifications advertised in the job announcement/advertisement and the quality of the submitted resume and application paperwork that includes all of the required elements.

-Bias is an inclination or prejudice for or against one person or group. Unconscious bias are feelings we have towards other people or groups of people. Unconscious feelings play a small part in influencing our judgement of certain people and groups, away from being balanced or even-handed, in many different areas of life, including the workplace. Feelings about gender and stereotypes we've all developed throughout our lives. How we were brought up, where you were brought up, how we've been socialized, our experiences, our exposure to other social identities and social groups, who our friends are and friends we have had through our lives, as well as media influences, all affect how we think and feel about certain types of people or feelings toward men and women.

It is important to note that most bias stereotypes, do not come from a place of bad intent. It's just deep seated, unconscious stereotype that's been formed in our brains through years of different influences we often have no control over.

Biases can affect our decision-making process in different ways like perception – how we see people and perceive reality. Attitude and how we react to certain people and how comfortable we are with certain people.

-Implicit biases can include:

- Stereotypical beliefs and attitudes about social groups such as:
- Men and Women/certain jobs are for one of these groups
- White and Black and other people of color
- Old and young employees and work experience
- Even people's dress and hairstyle can be impacted by bias.

-These beliefs and attitudes can affect one's perception, behavior and judgement about the people in those groups. We need to be aware of the nuances of cultural issues, language barriers and disabilities. It is natural to show a preference for people that share similarities and reject people with characteristics that we are unfamiliar with. So, the first thing to do is to get familiar with unknown experiences, cultures, and people.

Research in this area indicates that every person brings a lifetime of experience and cultural history that shapes their perspectives as related to candidate selection.

We want to attract diverse applicants for all of our positions and want to maintain them.

Good practices to counterbalance the effects of inherent bias include:

- Learning about research on bias and assumptions and striving to minimize their influence on the evaluation of candidates.
- Developing criteria based on position qualifications directly from the job announcement for evaluating candidates and applying them consistently to all applicants.
- Spending sufficient time evaluating each resume/application package thoroughly.
- Evaluating each candidate's entire application package and not depending too heavily on only one element, such as the prestige of the degree-granting institution or post-doctoral program or the letter of recommendation.
- Explaining the decision for rejecting or retaining a candidate based on evidence in the candidate's submitted paperwork as it relates to the position qualifications.
- Be able to defend every decision for eliminating or advancing a candidate.
- Periodically evaluating the search committee's decision to consider whether evaluation bias and assumptions are influencing any decisions throughout the search process.
- All search committee members should discuss the objective(s) of the interview, the main topics or areas to be covered during the interview, the arrangements and interview appointment for each candidate. Please allow ample time to conduct the interview and time between interviews.
- All search committee members should develop a core set of questions for all applicants that will produce sufficient information to make an evaluation of the candidates' qualifications and allow equitable comparison of the candidates' expertise and skills in the line of work or discipline.
- Interview questions must be related to the job and essential job functions to determine the candidate's qualifications, knowledge, skills and abilities for the position.
- All search committee members should participate in all interviews to ensure fair and consistent evaluation of each applicant selected for interviews.
- The interview experience should be consistent and must provide the same opportunities as the other candidates.
- Everyone participating in the interview process must stay away from making comments, using humor or making any statements that could be interpreted as less formal, inappropriate or unlawful. Keeping the interview process formalized and consistent is the best practice to avoid anything that could be considered uncomfortable, illegal or inappropriate. Trying to make the candidate relaxed and at ease is always the best way to begin the interview process because it can be an intimidating experience for them. Starting by introducing the search committee members, explanation of the department that the position is in and the core job responsibilities can start the process positively.
- Document the information provided by the candidate being interviewed and not your opinions, feelings or statements about the person.
- Make sure all of your notes taken to evaluate applicants or interview notes are objective and not subjective; and are maintained and given to the Search Chair to keep in the Search folder.


Thanks for serving on our Search Committee!

re: Bias in Interviewing

CannonKlemenz, Rebecca <rebecca.cannonklemenz@ct.edu>

Tue 9/6/2022 3:01 PM

Bcc:Carrasquillo, Helena <HCarrasquillo@ccc.commnet.edu>;Cenet, Jean-Marc <JCenet@txcc.commnet.edu>;Amico, Michael C <MAmico@hcc.commnet.edu>;Turiano, Laura A <LTuriano@hcc.commnet.edu>

 1 attachments (1 MB)

NEOGOVCourse enrollment instructions.pdf;

Dear Colleague:

Thank you for serving on the Search Committee. As a condition of your participation you are required to complete the thirty (30) minute online module ***Bias in Interviewing***. As part of the search committee charge process committee members are required to complete the above course prior to being permitted the review of candidate resumes. As such, kindly complete it as soon as you are able to so as not to delay the search process.

In this module you will:

- Learn about and understand common biases and how they impact the interview process.
- Set up and follow systems that limit or prevent biased thoughts from affecting hiring decisions
- Apply strategies that prevent individual bias from impacting decision-making.

Please use the following link to access the NEOGOV website.

<https://login.neogov.com/signin?siteCode=LMS>.

A step by step tutorial is attached to facilitate your enrollment in this course.

Please feel to reach out to me should you have any issues of concern.

Thank you.



Rebecca Cannon-Klemenz

(she, her, hers)

CSCU Equal Employment and Opportunity Specialist and ADA Coordinator Designee – System Office

RCannon@commnet.edu - Tel: 860.723.0334 - Fax: 860.723.0080



**Connecticut State
Colleges & Universities**

Are you willing to serve on a search committee?

From CSCU-Announcement <CSCU-Announcement@ct.edu>

Date Thu 4/4/2024 9:00 AM

Hello,

The Recruitment & Talent team is updating the database of volunteers who wish to serve on search committees.

The use of search committees is prevalent in higher education and serves as a screening committee to identify the most qualified candidates to interview. Search committee composition should include a diverse group of employees who can provide valuable input when reviewing applicant materials, selecting applicants for interviews, and conducting interviews.

Interested in serving on a committee? Please fill out the questionnaire below.

[Search Committee Volunteer Form](#)

Benefits of serving on a search committee

- Professional development opportunity
- Contribute to a meaningful hire to the CSCU community
- Opportunity to build your network

Role of the search committee members

- Attend and actively participate in all meetings/interviews.
- Be compliant with ECR guidelines.
- Review and select candidates based on the requirements of the position.

Thank you for considering volunteering!

Recruitment Team

Recruitment & Talent Acquisition Center of Excellence
Connecticut State Colleges & Universities
Email: CSCU-RecruitmentTeam@commnet.edu

Managing within a Diverse Organization: Moving Beyond Compliance Towards Equity and Inclusion

1

Training Team/Presenters

- Dr. Diane Ariza, VP of DEI for SCSU
- Kerry Beckford
Interim Director of DE&I at CT State
- Rebecca Cannon-Klemenz, EEO Specialist at CSU
- Kimberly Carolina, Manager of EEO at CSU
- Dr. John-Paul Chaisson-Cardenas,
VP of DEI for CT State
- Dr. Lamar Coleman, VP of DEI for ECSU
- Nicholas D'Agostino, CSU Director of EEO
- Patricia M. Gagliardi, Director of Education
and Restorative Justice at SCSU
- Dr. Kimberly James,
Special Assistant to SCSU President
- Dr. Karen McLean
Associate Professor of Sociology at WCSU
- Jesenia Miner, VP of DEI for WCSU
- Dr. Kelvin Rutledge,
AVP for Institutional Inclusive Strategies and
Change Management at SCSU
- Ernestine Weaver, CSU General Counsel
- Dr. Craig Wright, VP of DEI for CCSU
- Natalie McCabe Zwerger,
Executive Director for RE-Center

2

Learning Objectives

- Provide a common understanding of the term's diversity, equity and inclusion and begin to identify priority areas in our system/campus where equity and inclusion can thrive.
- Understand and interact with a set of best practices for employer's regarding discrimination and harassment, including sexual harassment.
- Understand and acknowledge civil rights laws and protected classes and recognizing the legal implications of our decisions/actions
- Understanding Implicit Bias, Microaggressions, and Gaslighting and develop strategies to reduce these in the workplace
- Understand and define the concept of the equity lens and begin to recognize its impact on our relationships with others and their relationship with us.

3

Community Participation Expectations:

- Participation – Actively listen and engage as you can
- Respect – Be mindful of language and listen to hear not to respond
- Open-Minded – Prepare to engage with perspectives different than your own
- Confidentiality – What is said here stays here, but what is learned here leaves here
- Express Yourself – Use "I" statements
- Space – Be mindful of how you make it and/or take it
- Self-care – Take care of yourselves here in this space and once you leave it

4

Diversity Bingo

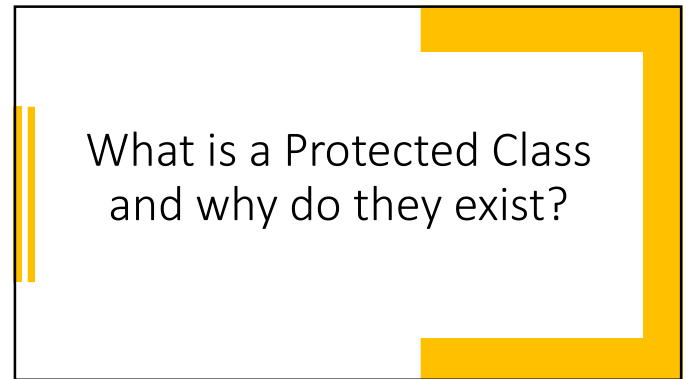
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Module 1 The Law

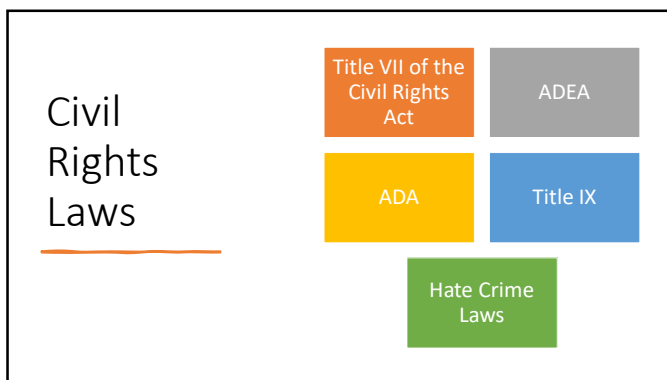
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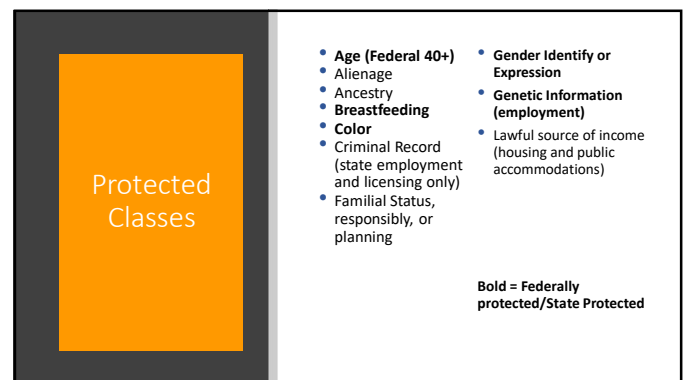
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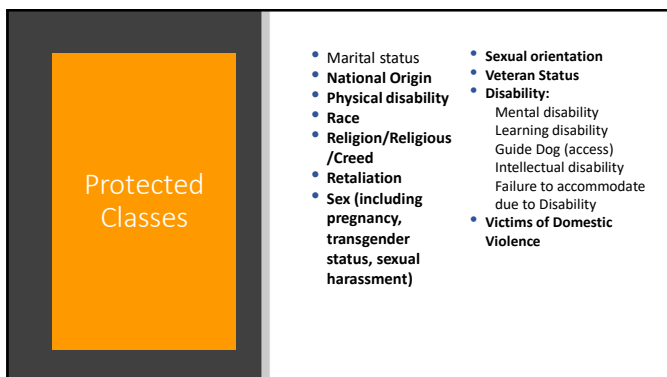
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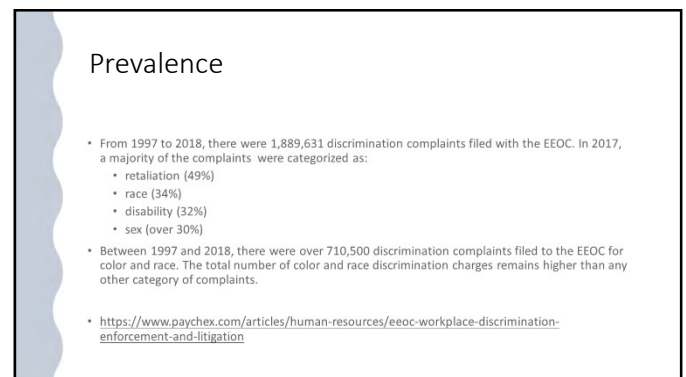
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10



11



12

Discrimination Differential Treatment

- Treating someone differently
- Based on individual's protected class status
- Interferes with or limits the ability of a person to participate in, or benefit from, the services, activities or privileges provided by the institution
- Otherwise adversely affect the person's employment or educational experience

13

Scenario

- You overhear several employees talking about how their colleagues always talk to each other in Spanish. You hear the following comments:
 - Why can't they just speak English?
 - Its rude – if you ask me
 - I'm sure they are talking about us
- Is this an issue related to discrimination?
- What other issues does this raise?
- What would you do in this situation?

14

Discrimination Disparate Impact

- A process, procedure or action that results in adverse impact towards members of a protected class.
- An action may not appear to be discriminatory on its face, but rather is one of discrimination based on its application or effect.

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Scenario

- A faculty member is informed that a student in their class requires time and a half for examinations. The faculty decides to give all students time and a half for examinations (e.g., a 60-minute examination is now 90 minutes without changing the content).
- Why might the faculty try this approach?
- Is there anything discriminatory or in violation of the ADA or other laws?
- If you were the Dean, how might you address this situation?

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Discrimination Hostile Environment

- Unwelcome verbal or physical conduct directed at another
- Because of that individual's protected class (e.g., gender/sex)
- That unreasonably interferes with the person's work or academic performance
- Sufficiently severe, pervasive or persistent
- Purpose or of creating a hostile work or educational environment
 - A one-time incident can be seen as severe

17

What is Sexual Harassment?

Illegal Sexual Harassment is defined in Conn. Gen. Stat. §46a-60(b)(8) as:

Any UNWELCOME sexual advances or request for sexual favors or any conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment,
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

18

What is your role in
these matters?

19

Module 2:
Whistleblower and
First Amendment
Protections in the
Workplace

20



WHISTLEBLOWER AND FIRST AMENDMENT PROTECTIONS IN THE WORKPLACE

21

Overview

- ▶ Connecticut statutes protect employees from retaliation for engaging in "whistleblowing" or for exercising their rights under the First Amendment
 - Conn. Gen. Stat. § 4-61dd
 - Conn. Gen. Stat. § 31-51q
 - Conn. Gen. Stat. § 31-51m
- ▶ The laws are nuanced and the following is not intended as personal legal advice

22

WHISTLEBLOWER RETALIATION CLAIMS

- ▶ **Conn. Gen. Stat. § 4-61dd**
 - Provides a cause of action for state employees who have engaged in protected whistleblowing activity and allege retaliation because of such report.
 - Employees file a claim with the Office of Public Hearing (OPH) rather than with court
 - The case is overseen by a Referee who makes rulings, hears evidence, and ultimately issues a decision on the merits, which can then be appealed to Superior Court

23

WHISTLEBLOWER RETALIATION CLAIMS

- ▶ **Who is protected?**
 - State employees
- ▶ **What is protected?**
 - Whistleblowing includes:
 - report of corruption,
 - unethical practices,
 - violation of state laws or regulations, mismanagement,
 - gross waste of funds,
 - abuse of authority or
 - danger to the public safety occurring in any state department or agency or any quasi-public agency
 - Personal grievances ≠ protected disclosures

24

WHISTLEBLOWER RETALIATION CLAIMS

- ▶ **To whom should the report be made?**
 - Protected disclosure must be made to:
 - the auditors,
 - Attorney General,
 - an employee of the agency where the person is employed,
 - an employee of a state agency as a mandated reporter, **or**
 - if a contractor an employee of the contracting state agency.
- ▶ **What is prohibited?**
 - Employer cannot take or threaten to take any personnel action against an employee because of the protected disclosure

25

WHISTLEBLOWER RETALIATION CLAIMS

- ▶ **Conn. Gen. Stat. 31-51m**
 - Provides that employer cannot discipline, discharge or penalize an employee for reporting a violation or suspected violation of state or federal law or for participating in an investigation or hearing requested by a public body or court
- ▶ **Who is protected?**
 - Public and private employees
- ▶ **What is protected?**
 - a report of a violation or suspected violation of state or federal law; **or**
 - for participating in an investigation or hearing requested by a public body or court

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WHISTLEBLOWER RETALIATION CLAIMS

- ▶ **To whom should the report be made?**
 - a legal violation (or suspected violation) must be reported to government authorities as defined as "public body", according to the statute.
- ▶ **What is prohibited?**
 - Employer cannot:
 - discipline,
 - discharge **or**
 - penalize an employee for reporting a violation

27

Free Speech Retaliation

- ▶ **First Amendment (Generally)**
 - Employee must have engaged in protected speech
 - Employee must prove that:
 - the employer's actions adversely effected the First Amendment rights or that employee suffered some concrete harm; **and**
 - the employer's actions were motivated by the employee's exercise of their First Amendment rights

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Free Speech Protections

- ▶ **Conn. Gen. Stat. 31-51q**
 - Connecticut's free speech statute provides a cause of action for private and public employees who are terminated, or otherwise disciplined, as a result of exercising their free speech rights, as protected by the federal and state constitutions.
 - With certain limits.
 - The law attempts to balance the employee's right to free speech with an employer's interests in controlling its own message and preserving workplace discipline, harmony, and efficiency. *Trusz v. UBS Realty Investors, LLC*, 319 Conn 175 (2015)

29

Free Speech Protections

- ▶ **Section 31-51q, as amended by Public Act 22-24 provides that:**
 - any employer, who subjects or threatens to subject any employee to discipline or discharge on account of
 - (1) the exercise by such employee of rights guaranteed by the first amendment to the United States Constitution or section 3, 4 or 14 of article first of the Constitution of the state, provided such activity does not substantially or materially interfere with the employee's bona fide job performance or the working relationship between the employee and the employer, or (2) such employee's refusal to (A) attend an employer-sponsored meeting with the employer or its agent, representative or designee, the primary purpose of which is to communicate the employer's opinion concerning religious or political matters, or (B) listen to speech or view communications, the primary purpose of which is to communicate the employer's opinion concerning religious or political matters,
 - shall be liable to such employee for the full amount of gross loss of wages or compensation, with costs and such reasonable attorney's fees as may be allowed by the court. If the court determines that such action for damages was brought without substantial justification, the court may award costs and reasonable attorney's fees to the employer.

30

Free Speech Protections

- ▶ Who is protected?
 - Public and private employees
- ▶ What is protected?
 - Free speech as protected by the federal and state constitutions, **or**
 - An employee's refusal to:
 - (A) attend an employer-sponsored meeting with the employer, when the primary purpose of the meeting is to communicate the employer's opinion concerning religious or political matters, **or**
 - (B) listen to speech or view communications, the primary purpose of which is to communicate the employer's opinion concerning religious or political matters

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Free Speech Protections

- ▶ Captive-audience Meetings
 - The statute's new language now bars compulsory meetings on political matters, which include "the decision to join or support any...labor organization," These are typically referred to by organized labor as "**captive-audience meetings.**"
 - Captive-audience meetings are mandatory meetings held during work hours during which employers discuss statutory labor rights with employees, oftentimes in response to a labor or trade union organizing campaign.

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Free Speech Protections

- ▶ What the Act Permits
 - The law allows the following:
 - An employer communicating to its employees any information that they are required by law to communicate, and only allows them to do so to the extent of what is legally required;
 - An employer communicating to its employees any information that is relevant and necessary for the performance of their duties;
 - Permits institutions of higher education to meet with or discuss with employees matters relating to coursework or academic programs;
 - Casual conversations between employees or between an employee and an employer; and
 - Any requirement limited to managerial and supervisory employees.

33

Free Speech Protections

- ▶ What is prohibited?
 - Employers cannot terminate, or otherwise discipline because an employee exercised their free speech rights
- ▶ What are the limits?
 - Employee's free speech cannot substantially or materially interfere with either:
 - employee's bona fide job responsibilities **or**
 - with the employee's working relationship with the employer
 - The law, however, does not protect employees if they speak as part of their official duties. In other words, the employee must have spoken as a "public citizen".
 - To be protected, the speech must be of "public concern" and not regarding a personal matter.
 - For example, protected speech could be political, social or legal in nature, e.g. abortion rights.
 - Being denied a promotion, for example, is a matter of personal concern.

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Free Speech Protections

- According to the Connecticut Supreme Court, the law adequately protects the right of employers to control employees' job related speech.
- "Under this standard, if an employee's job related speech reflects a mere policy difference with the employer, it is not protected. It is only when the employee's speech is on a matter of public concern and implicates an employer's **official dishonesty . . . other serious wrongdoing, or threats to health and safety** . . . that the speech trumps the employer's right to control its own employees and policies."
- *Trusz v. UBS Realty Investors, LLC*, 319 Conn. at 212

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Module 3:
The national
dialogue on race,
sexual orientation,
gender...

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The Constitutional Debate about Race

Anticlassification or Colorblind Constitutionalism

A legal doctrine that holds that skin color or race is virtually never a legitimate ground for legal or political distinctions, and thus, any law that is "color-conscious" or "race-sensitive" is presumptively unconstitutional regardless of whether its intent is to subordinate a group or remedy discrimination.

Antisubordination or Race Sensitive Constitutionalism

A legal doctrine that argues that equal citizenship cannot be realized under conditions of pervasive social stratification and argue that law should reform institutions and practices that enforce the secondary social status of historically oppressed groups.

A. Ancheta, 2008; A. N. Ancheta, 2008; Gross, 2019; Kennedy, 2013

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"The way to stop discrimination on the basis of race is to speak openly and candidly on the subject of race, and to apply the Constitution with eyes open to the unfortunate effects of centuries of racial discrimination."

Now Supreme Court Associate Justice Sonia Maria Sotomayor in *Schuetz v. Coalition to Defend Affirmative Action* (2014)



"The way to stop discrimination on the basis of race is to stop discriminating on the basis of race."

Now Supreme Court Chief Justice John Glover Roberts Jr. in *Parents Involved in Community Schools v. Seattle School District No. 1* (2007)

39

The national debate on race in increasingly polarized

Year	Poll Information
2010	Polling showed that white individuals were twice as likely (40%) to assert that "Black people are responsible for their own condition," as compared to selecting other systemic explanations for the continued existence of racial disparities. (Hanson & Zogby, p.579)
2017	Half of white respondents, 55% of those polled, said that they believe that "white people are being discriminated against today." (Robert Wood Johnson Foundation and Harvard's T.H. Chan School of Public Health)
2019	75% of white Republicans, from a representative sample of 1,003 registered voters with a margin of 3.1 percent points, believe that white people face discrimination because of programs designed to support people of color. (Hill-HarrisX)
2022	53% of Americans believe 'that white people in the US have certain advantages because of the color of their skin. However, Republicans agreeing with this view falls significantly, to 19%. Two-thirds of Republicans (67%) believe that America is "in danger of losing its culture and identity". (D. Rhodes, University of Massachusetts in Amherst)

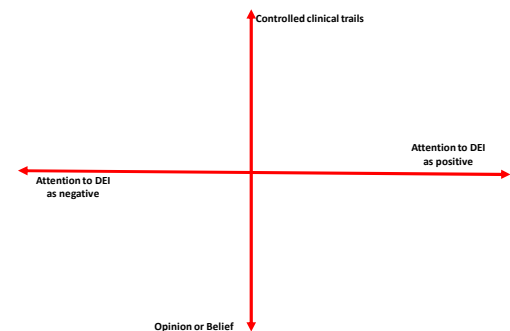
40

The Scientific and Research Debate

- **Definition:** For this exercise **Critical Rigor** are a set of practices that are designed to challenge biases and discern academic and scientific quality and credibility. Examples include but are not limited to:
 - Scientific methods (Hard and social sciences)
 - Research methods (Hard and social sciences)
 - Peer reviews (All academic areas)
 - Statistical Evidence (All academic areas)
 - Triangulation (Evaluation, Quantitative, Mixed and Qualitative Research)
 - Historical methods (History)
 - External Audits (Evaluation and qualitative research)
 - Metaevaluation (All evaluation and research)
 - Literature Reviews (Most research)

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Exercise: Body of Literature: Orientation by Critical Rigor



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Break/Lunch

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Module 4: Beyond Legal Mandates: Understanding Microaggressions, Implicit Bias, and Gaslighting



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Understanding Microaggressions, Implicit Bias, and Gaslighting

<https://www.mentimeter.com/app/presentation/alfn8ykwqf6e487gnatzr2jc6dh3r98>

45

Module 5: Being Equity Minded in Practice



46



Advancing equity & social justice
Driving transformative change.



Micky Scottbey Jones

Together we will create *brave space*.
Because there is no such thing as a "safe space" —
We exist in the real world.
We all carry scars and we have all caused wounds.
In this space
We seek to turn down the volume of the outside world,
We amplify voices that fight to be heard elsewhere,
We call each other to more truth and love.
We have the right to start somewhere and continue to grow.
We have the responsibility to examine what we think we know.
We will not be perfect.
This space will not be perfect.
It will not always be what we wish it to be.
But
It will be *our brave space together*,
and
We will work on it side by side.

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Characteristics of safe and brave spaces (Ravitch & Kannan, 2022)

Safe spaces	Brave spaces
Prioritize notions of politeness of some	Prioritize honesty and authenticity for all
Focus on socially constructed idea of comfort which comes with invisible rules	Acknowledge discomfort is inevitable in discussing difficult issues and invites it as a constructive process/experience
Can lead to defensiveness, lack of authenticity, and deflection	Value risk taking, vulnerability, learning, and being challenged to reflect
Narrowly defines safety, usually from a dominant white male, middle-class ableist perspective imposed as a norm	Safety means different things across people, attend to how individuals experience it to reach group understanding and norms
Tend not to prepare participants to engage in difficult conversations, reinforces "taboo topics," and marginalizes POC	Prepare groups for difficult conversations, develop understandings of critical dialogic engagement as professional development

From: Flux Leadership: Real-Time Inquiry for Humanizing Educational Change, 2022



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Identity Sculptures

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Diversity

Diversity includes all the ways in which people differ, and it encompasses all the different characteristics that make one individual or group different from another. It is all-inclusive and recognizes everyone and every group as part of the diversity that should be valued. A broad definition includes not only race, ethnicity, and gender—the groups that most often come to mind when the term “diversity” is used—but also age, national origin, religion, disability, sexual orientation, socioeconomic status, education, marital status, language, and physical appearance. It also involves different ideas, perspectives, and values.

It is important to note that many activists and thinkers critique diversity alone as a strategy. For instance, Baltimore Racial Justice Action states: “Diversity is silent on the subject of equity. In an anti-oppression context, therefore, the issue is not diversity, but rather equity. Often when people talk about diversity, they are thinking only of the “non-dominant” groups.”

SOURCE: UC Berkeley Center for Equity, Inclusion and Diversity, “Glossary of Terms” (page 34 in 2009 Strategic Plan). Baltimore Racial Justice Action, “Our Definitions” (2018).



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Inclusion

Authentically bringing traditionally excluded individuals and/or groups into processes, activities, and decision/policy making in a way that shares power.

SOURCE: [OpenSource Leadership Strategies](#)



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RACIAL JUSTICE is the systematic fair treatment of people of all races that results in equitable opportunities and outcomes for everyone. All people are able to achieve their full potential in life, regardless of race, ethnicity or the community in which they live.

Racial justice — or racial equity — goes beyond “anti-racism.” It’s not just about what we are against, but also what we are for.

(NYSED Culturally Responsive-Sustaining Education Framework, 2019)

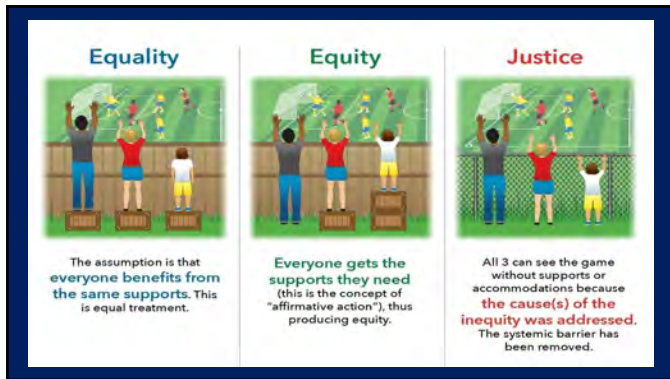


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Equity is the removal and reduction of barriers that negatively impact student success within structures, policies and practices and ensuring that students receive targeted resources and supports to achieve their academic, professional, and personal goals. Equity is achieved by identifying and intentionally addressing structural racism, systemic poverty, and other forms of marginalization, upholding the expectation that administrators, faculty, and staff act as anti-racist institutional change agents.

CT State Community College commits to bold and disruptive change by actively identifying, naming, and dismantling structural racism, systemic poverty, and other barriers, establishing equitable and anti-racist policies and practices, and empowering students, faculty, staff, and administrators to advance racial, social, and economic justice. Our core collective responsibility is to continuously assess practices and policies and transform the world we live in by eliminating inequities.

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Privilege

Privilege is unearned access or advantages granted to specific groups of people because of their membership in a social group. Privilege can be based on a variety of social identities such as race, gender, religion, socioeconomic status, ability status, sexuality, age, education level and more.

Privilege can be experienced on personal, interpersonal and institutional levels. The social, economic, political and psychological unearned advantages that privileged groups hold come at the expense of marginalized groups. Within the United States, members of social groups that hold privileges (white, male, wealthy, able-bodied, etc.) have historically held dominance and power over targeted groups.

https://unitedwaysem.org/equity_challenge/day-3-what-is-privilege/

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Social Identities	Advantaged/ Privileged Identity	Disadvantaged/ Oppressed Identity	-ism associated with this identity
Race			
Sex			
Gender			
Sexual Orientation			
Class			
Ability/Disability			
Religion			

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Social Identities	Advantaged/ Privileged Identity	Disadvantaged/ Oppressed Identity	-ism associated with this identity
Race	White People	Asian, Black, Latino, Native Americans	Racism
Sex	Bio Men	Bio Women	Sexism
Gender	Gender conforming bio men and women	Transgender, gender queer, intersex	Transgender oppression
Sexual Orientation	Heterosexual people	Lesbians, gay men	Heterosexism
Class	Rich, upper-class people	Working class, poor people	Classism
Ability/Disability	Able-bodied people	People with disabilities	Ableism
Religion	Protestants/Christian	Jews, Muslims, Hindus	Religious oppression

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Social Identity	Your Identity	Your Identity	Your Identity	Your Identity	Privileged or Oppressed	Has this identity changed during your lifetime
Race/Ethnicity						
Mental/ Physical Ability						
Sexual Orientation						
National Origin						
Gender						
Gender Identity/ Expression						
Age						
Work Experience						
Appearance/Bod y size, etc.						
Religion						
Income/ Socioeconomic Status						

All About Me Activity

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Video debrief

- ★ What do you think it takes to make the shift from ally to co-conspirator?
- ★ Can you reflect on a time that you wished or hoped you intervened differently?
- ★ Have you yourself been or has someone you know been a co-conspirator?
- ★ How do folx we supervise and work with feel and see evidence of our co-conspirator status?

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Driving transformative change.

An equity lens

An equity lens is one through which decisions and actions are made:

- 1) centering the value of equity,
- 2) mitigating the influence of bias, &
- 3) elevating the experiences, needs, and voices of folx from historically excluded identities

(McCabe Zwerger, 2022).

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Essential questions

How do our students know and feel we have a deep commitment to equity, inclusivity, & racial justice?

- What has changed for them directly as a result of our work?

How do our faculty, admin, & staff know we have a deep commitment to equity, inclusivity, & racial justice and how do they feel the impact of that commitment?

- What has changed for them and how have they changed as a result of our work?



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Areas where your commitment to DEIRJ can thrive

- ♦ Mission, vision, values, & strategic plan
- ♦ Policy & governance
- ♦ Performance management, feedback, & supervision
- ♦ Data analysis through the lens of racial equity & inclusion
- ♦ Decision-making protocols
- ♦ Campus climate & student experience
- ♦ Workplace climate for faculty, admin, & staff, and its impact on those with whom we interact
- ♦ Recruitment/hiring/retaining new staff, admin, & faculty
- ♦ Representation, retention & leadership development of *historically excluded* staff, admin, & faculty
- ♦ Culturally responsive practices in and out of classrooms
- ♦ Communications & public-facing presence
- ♦ Assessing relationships and restoring when harm occurs
- ♦ Professional learning, training, and activating of new staff

MCCABE ZWERGER | 2021

DEIRJ: Diversity, equity, inclusion, & racial justice

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Analyzing campus interactions

- How might identity be a factor? (*race*, ethnicity, gender, sexuality, country of origin, language, dis/ability, socioeconomic, religion, etc.)
- Have we heard from BIPOC? From LGBTQ+ voices? The voices of folx from other historically excluded identities?
- Who has been *silent*?
- Who has been *silenced*?
- Have we *avoided* a conversation about race or colorism by deflecting?
- Have we *accepted* an opportunity to uphold our commitment to equity & racial justice, even if it means we will confront or prompt discomfort?
- How have we been attentive to staff with fewer years on campus? Fewer years of experience in the field? How might power dynamics be at play?

(McCabe Zwerger, 2020)

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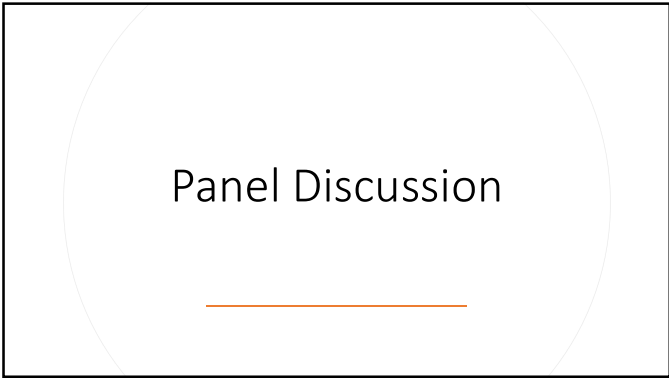
Common negotiations before intervening

- 1) The depth of the relationship
- 2) The power dynamics at play
- 3) The chance of being misunderstood
- 4) The possible pushback, negative response, or even retaliation
- 5) The benefit to me/the folx I represent

****These negotiations happen internally, consciously or unconsciously, and can occur whether the visible harm is a microaggression or macro injustice we experience or witness.**

(NYU Center for Strategic Solutions, 2021)

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CSCU Managerial/Confidential Employee Diversity, Equity and Inclusion Training Opportunities

From CSCU-Announcement <CSCU-Announcement@ct.edu>

Date Tue 12/5/2023 11:55 AM

To CSCU-Announcement <CSCU-Announcement@ct.edu>



Dear CSCU Managerial/Confidential Employee:

As part of the CSCU's commitment to building our capacity to meet the ever-growing needs of our diverse faculty, staff, and students, we will be offering sessions to expand our understanding of inclusive practices for populations within our CSCU community. This fall our session will be focused on the LGBTQ+ community. Soon you will receive a save the date for our spring sessions focused on individuals with disabilities.

We have scheduled the following session to take place virtually on December 8th and 15th.

Understanding the Expanding 'Genderverse': Tangible Strategies for Inclusive Workplaces and Classrooms.

Members of the LGBTQ community can often feel marginalized in work and education spaces. Additionally, the broader climate around the country is also a factor in how folks from marginalized groups may feel in our communities. As such, CSCU is bringing in two speakers to focus on the following:

- Understanding the expanding and emerging 'Genderverse' (including pronouns)
- Intersectionality of identities
- Creating inclusive work and learning environments for LGBTQI employees and students.

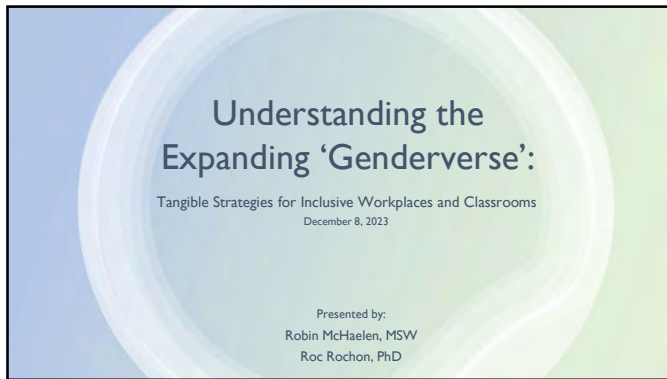
To register for one of the December sessions, please click a link below:

[1. December 8, 2023, Session \(9AM to Noon\)](#) (deadline to register is COB 12/6/2023)

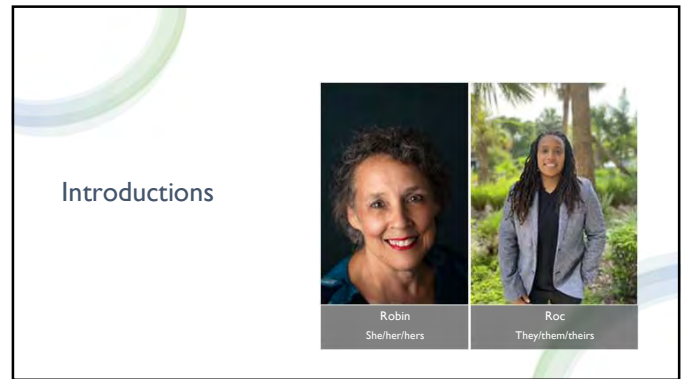
[2. December 15, 2023, Session \(9AM to Noon\)](#) (deadline to register is COB 12/13/2023)

We will offer additional in-person sessions in early 2024.

Thank you.



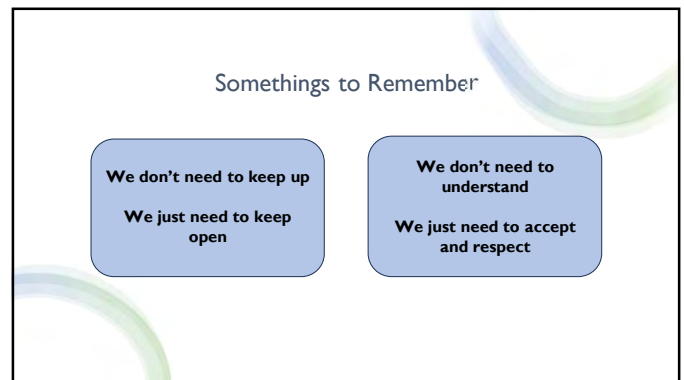
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6

Psychological Safety

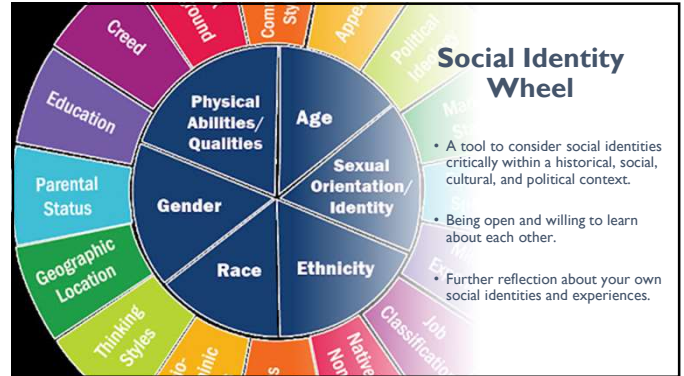
- Protection from harm
 - Create an inclusive culture
 - Encourage DEI
- Lead with vulnerability
- Encourage dissent
- Celebrate failures as lessons learned
- Cultivate open feedback



7

Social Identity Wheel

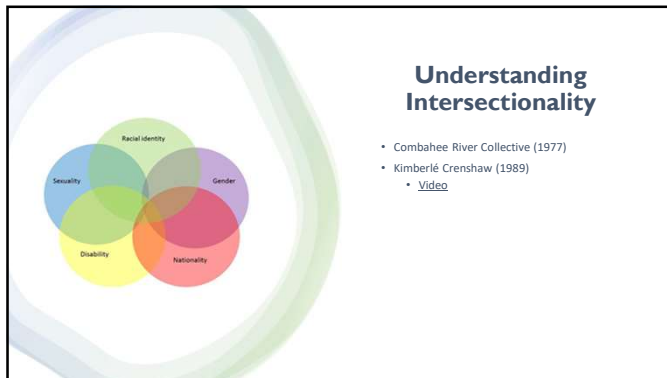
- A tool to consider social identities critically within a historical, social, cultural, and political context.
- Being open and willing to learn about each other.
- Further reflection about your own social identities and experiences.



8

Understanding Intersectionality

- Combahee River Collective (1977)
- Kimberlé Crenshaw (1989)
 - [Video](#)



9



10

Reflection Questions to Consider (Small Groups)

- Which identities do you think about most often?
- Which identities do you think about least often?
- Which identities have the strongest effect on how you perceive yourself?
- Which identities have the greatest effect on how others perceive you?

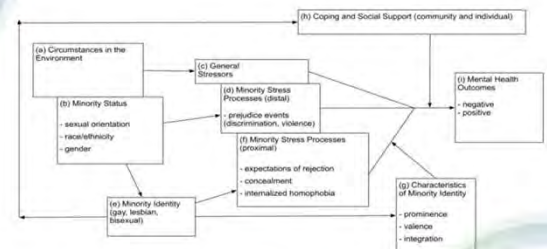
Large group discussion: what is something you are taking away from this discussion? Is there anything you can bring back to your team?



11

Minority Stress Model (Meyer, 2003)

(Historically marginalized)



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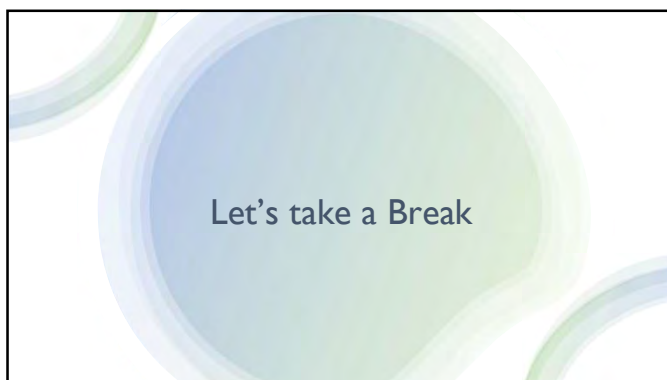


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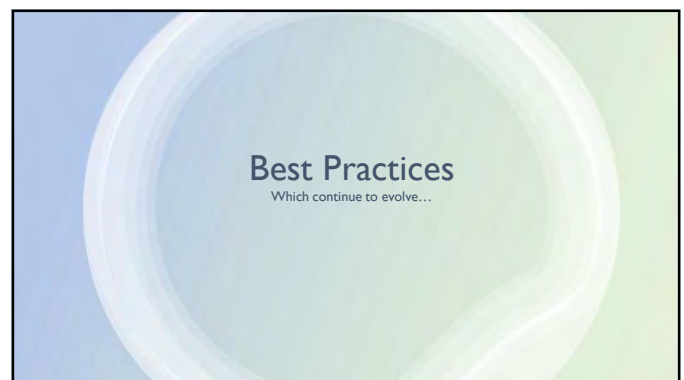
Developing a Common Language (Definitions)

- **Sex assigned at birth:** a system of classifications which are assigned at birth typically by medical personnel based on visible genitalia and other physical characteristics.
 - Western culture widely advances three categories with which to understand assigned sex at birth differences, and we live our lives by identifying with them e.g., female, male, and intersex. Intersex is a general term used for a person born with variations of chromosomal characteristics, gonads, anatomy, etc.
- **Gender Identity:** gender identity does not always align with one's assigned sex at birth. A person's sense of being in the world, including a woman, man, a combination or both or neither at all.
- **Cisgender:** when your assigned sex at birth corresponds with your gender identity
- **Transgender/Trans:** when your assigned sex at birth does not correspond with your gender identity.

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15



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Pronoun Best Practices

- Offer your pronouns when meeting new people and include your pronouns on your email signature. You also can ask other's what their pronouns are too.
- Use gender inclusive language when addressing groups
- If you make a mistake, correct yourself, and move on
- Practice using less familiar pronouns like "they/them" or "Ze/Zir"
- Gently correct others who misgender



17

TERMS OF THIS	TERMS
Transsexual	Trans or Transgender
Sex Change/Sex Reassignment	Gender Affirmation/Gender Marker Change
Biological man or biological woman	Cisgender man/Cisgender Woman
Feminine/female pronouns	She/Her Pronouns
Masculine/male pronouns	He/Him Pronouns
Preferred Pronouns	Pronouns
Homosexual	Gay or Lesbian
Lifestyle or preference	Orientation or Identity
Ladies and Gentlemen	Colleagues/Team/Folks/Friends/People
Maternity/Paternity Leave	Parental Leave
Opposite Sex/Birth Sexes	All sexes (biology) or all genders (identity)
Assuming a person's pronoun	Default to they/them or use their name
Hermaprodite	Intersex
Born male or born female	Assigned male or female at birth
They were a girl but became a boy	He is a boy who was assigned female at birth
They were a boy but became a girl	She is a girl who was assigned male at birth
Being defensive with a mistake	Make a quick apology and keep trying
I can't keep up with all of this stuff	I will stay open and continue learning

Language (Current) Best Practices



18

Relating back to Practice: Case Studies

19

Case Studies (Small Groups)

- Designate a RECORDER and a REPORTER
- Answer the following questions:
 - a. Faced with this situation, what would your immediate response be?
 - b. How might you support the parties involved personal/professional growth and development?
 - c. Are there policies or practices that might be put in place to prevent the problem that would be useful going forward?

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Case Study #1

- A member of your team (Jean) is transitioning from the sex they were assigned at birth to their affirmed gender.
- Most members of your team have been supportive. Pat, however, is struggling to balance their strongly held religious beliefs with state and University non-discrimination policies. Pat is refusing to use the transitioning person's new name and pronoun.
- Pat comes to you and wants to file a grievance to keep Jean out of the bathroom while Pat is using it.

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Case Study #2

- A recent anti-LGBTQ+ speaker has sparked protests, hurt feelings, and heightened agitation/conflict among students, faculty and staff with multiple and conflicting sides of the issue being expressed.
- Managers (like you) have been tasked with creating a plan to address this situation and help the university be more prepared for others as they arise.

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So, What? Now What?

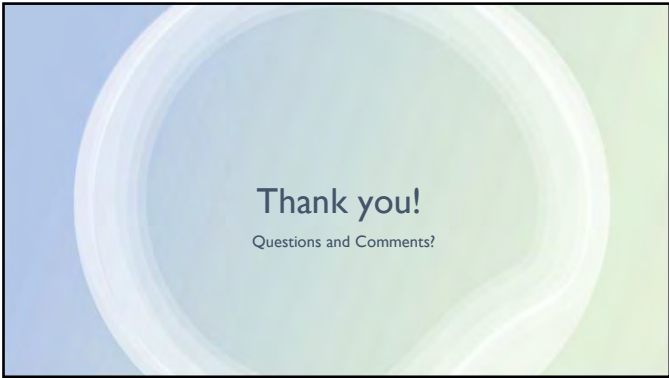
- What are you going to do?
- What will you commit to?
- Who will you center in the process?
- Accountability

23

References

- Edmonson, A. (1999). Psychological Safety and Learning Behavior in Work Teams. *Administrative Science Quarterly*, 44(2), 350-383. <https://www.proquest.com/proxy2.cl.msu.edu/docview/203964176/fulltextPDF/57B20B7027B34E86PQ/1?accountid=12598>
- <https://hbr.org/2023/02/what-is-psychological-safety>
- <https://www.worldhappiness.academy/>
- Transathlete.com, <https://www.transathlete.com/>

24



DE&I Training for Managers - New Training Opportunity: Escaping Inaccessibility

From CSCU-Announcement <CSCU-Announcement@ct.edu>

Date Wed 5/22/2024 11:01 AM

To CSCU-Announcement <CSCU-Announcement@ct.edu>



DE&I Training for Managers - New Training Opportunity: Escaping Inaccessibility

Dear CSCU Managerial/Confidential Employee:

As part of the CSCU's commitment to building our capacity to meet the ever-growing needs of our diverse faculty, staff, and students, we will be offering sessions to expand our understanding of inclusive practices for populations within our CSCU community. This spring and summer our sessions will be ***Escaping Inaccessibility***, an interactive session focused on creating inclusion for individuals with disabilities.

This interactive 3-hour in-person training will focus on the basics of ADA laws, regulations, processes, for both students and employees within the CSCU system. In addition to learning this information participants will have the exciting opportunity to participate in a live-action ESCAPE ROOM experience, focused on different accessibility issues faced on our college and university campuses.

We have scheduled the following sessions to take place in-person on June 11 and June 27.

- **Tuesday, June 11, 2024 at Southern Connecticut State University from 1:00 p.m. to 4:00 p.m. in the School of Business**
- **Thursday, June 27, 2024 at CT State Community College - Tunxis from 9:00 a.m. to 12:00 p.m., in room 127/129**

To register for one of the June sessions, please click a link below:

[Southern - June 11, 2024](#) - **deadline to register is COB June 4, 2024**

[Tunxis - June 27, 2024](#) - **deadline to register is COB June 20, 2024**

We plan to offer additional sessions, including a virtual option, in the future.

Thank you.



Section 46a-68-80
External Communication

Section 46a-68-80: EXTERNAL COMMUNICATION AND RECRUITMENT STRATEGIES

Subsection (a)

Charter Oak State College, through the Connecticut State Colleges and Universities (CSCU) System Office shared services model, has developed means of recruiting goal candidates for current positions.

All of the applicants apply to the CSCU System Office's Human Resources Department through an Applicant Tracking System and all of the vacant positions are posted on the Connecticut State Colleges and Universities (CSCU) website. Search committees also receive a listing of diverse publications to review for broader recruitment efforts.

Subsection (b)

Charter Oak State College (COSC) has put itself on public record as an Affirmative Action and Equal Employment Opportunity employer. Consistent with that posture:

1. Written expression of Charter Oak State College's commitment to affirmative action and equal employment opportunity and notice of job availability are sent to recruiting sources and organizations which refer qualified applicants for employment. All job postings and advertisements include a statement that Charter Oak State College is an Affirmative Action and Equal Employment Opportunity Employer. Charter Oak State College's commitment to affirmative action is stated on all notices of job openings and mailed to a resource list that targets underrepresented populations and organizations specifically to attract qualified experts in different areas of specialties in higher education and administration. All notices contain the statement: "Charter Oak State College is an Equal Opportunity Employer/Affirmative Action Employer, M/F."

The job announcements also post Charter Oak State College's Continuing Notice of Nondiscrimination. Charter Oak State College (COSC) does not discriminate on the basis of race, color, religious creed, age, gender, gender identity or expression, national origin, marital status, ancestry, present or past history of mental disorder, learning disability or physical disability, veteran status, sexual orientation, genetic information or criminal record. COSC is an Equal Opportunity Employer.

2. Charter Oak State College (COSC) is an Affirmative Action and Equal Employment Opportunity Employer and notice was sent to the union that represent the collective bargaining employees. This notice contained an invitation to review and comment upon the CSCU's System Office Affirmative Action Plan. The communication that was sent to the union is included in this section.

Subsection (c)

Charter Oak State College initiates and undertakes vigorous, positive relationship-building activities to ensure that affirmative action is more than a paper commitment. In partnership with the CSCU System Office, Charter Oak State College has worked to secure ongoing relationships and develop additional recruiting sources while cultivating outreach recruitment programs and maintaining contact with protected class members and resources agencies.

Section 46a-68-80: EXTERNAL COMMUNICATION AND RECRUITMENT STRATEGIES

Charter Oak State College uses publication sources that include underrepresented groups and diversity. Networking with professional associations that target the specific field of expertise has been another avenue used to attract diverse and underrepresented populations that are skilled and qualified in the area and focus of recruitment.

The college utilizes an applicant tracking system for all unclassified positions and JOBAPS for all classified positions. Both tools utilize social media to expand recruitment outreach efforts. Platforms supported include Indeed, Facebook, Pinterest, Twitter, LinkedIn.

The Charter Oak State College excludes any references to either age or gender from all employment advertisements except in the case of bona fide occupational qualification or need.

A list of additional resources for diverse recruiting is shared with the hiring manager upon commencement of a search. The list of the additional resources is included in this section.

The Director of HR Talent Acquisition and the Director of EEO encourage members of each search committee that is part of any association, society, board or educational network related to the skills and requirements the job should be used when recruiting for positions.

Several staff members also maintain memberships in the College and Universities Professional Association for Human Resources (CUPA), International Public Management Association for Human Resources (IPMA), Government Finance Officers Association (GFOA), American Institute of Architects (AIA), National Association of College and University Business Officers (NACUBO), CT Information Systems Audit and Control Association (ISACA), National Association of Student Financial Aid Administrators (NASFAA), National Association for College Admission Counseling (NACAC), American Association of Collegiate Registrars and Admissions Officers (AACRAO), CT Association of Professional Financial Aid Administrators (CAPFAA), Association of Intuition Research (AIR), and the National Associations of College and University Attorneys (NACUA).

The Director of EEO is also a member of the Connecticut Association for Diversity and Equity Professionals (CADEP) which represents AA/EEO, diversity, inclusion and equity and access professionals from all State Agencies. These recruiting sources and the cultural commissions assigned to the General Assembly are also forwarded position vacancies which include the Commission on Women, Children and Seniors and the Commission on Equity and Opportunity.

In all collective bargaining agreements, it is the expectation that representatives of the State shall bargain in good faith for the inclusion of nondiscrimination and affirmative action clauses in the union contracts. Management representatives will be requested to deliberate in good faith for the inclusion of these clauses.

Names and addresses of all recruiting resources, external business organizations and all communications to individuals and organizations are now kept electronically and are maintained in the Human Resources Office. A listing of recruitment resources that is used with the hiring managers when recruiting for positions is included in this section.

Section 46a-68-80: EXTERNAL COMMUNICATION AND RECRUITMENT STRATEGIES

The Equal Employment Opportunity Officer/Manager of Diversity and Inclusion have participated in a mandated grievance training session in pursuant of Public Act 92-85 as well as training in pursuit of Public Act 03-151. The Manager of Diversity and Inclusion attended additional affirmative action, equal employment opportunity, ADA, Title IX training offered by the CT Association of Diversity and Equity Professionals (CADEP). Also, other training sessions that were attended by the Equal Employment Opportunity Officer include legal updates training with Shipman and Goodwin, IPMA and also some Webinars were viewed by staff during the reporting period. Other CSCU staff attended statewide, regional and local meetings, fairs and other events to become familiar with organizations and their staff with whom mutually beneficial relationships might be established.

The attached documentation presents the set-aside purchasing goals from small contractor and minority business enterprise submitted by the Charter Oak State College for activity during the reporting period. Quarterly reports that include small women, disabled and minority business enterprise purchases are included in the Affirmative Action Plan.

Section 46a-68-80: EXTERNAL COMMUNICATION AND RECRUITMENT STRATEGIES

Routine Recruitment/Referral Sources/Internet Sites

http://www.AsiansInHigherEd.com	http://www.NativeAmericansInHigherEd.com
http://www.BlacksInHigherEd.com	http://www.VeteransInHigherEd.com
http://www.HispanicsInHigherEd.com	http://www.WomenandHigherEd.com
http://www.DisabledInHigherEd.com	http://www.LGBTInHigherEd.com
http://www.militaryhire.com	http://www.restaurant.org
https://www.higheredjobs.com	http://www.hcareers.com
https://www.vetfriends.com	https://www.linkedin.com
http://minoritynurse.com	http://www.careerbuilder.com
http://www.jobtarget.com/corporate	http://www.monster.com
http://www.ct.edu (All CSU institutions)	http://www.indeed.com
http://studentaffairs.com	http://www.dice.com
http://www.eeoc.gov	http://www.simplyhired.com
http://www.mainecareercenter.com	https://www.shrm.org/pages
https://www.suny.edu	http://www.prodivnet.com
http://matyconn.matyc.org	http://www.hireahero.org
https://www.insidehighered.com	http://www.healthcarejobsite.com
http://www.quintcareers.com	https://www.glassdoor.com
http://www.counseling.org	https://chroniclevitae.com
http://www.ala.org	http://das.ct.gov
http://www.ctnurses.org	https://www.prodivnet.com
http://jobs.acfchefs.org	https://twitter.com

Agency Sources:

Organization	Address	City, State	Zip Code
American Association of AA	888 16th Street, NW Suite 800	Washington, DC	20006
Capital Workforce Partners	One Union Place	Hartford, CT	06113
CADEP	P.O Box 260412	Hartford, CT	06126
CT Assoc. of Latinos in Higher Ed.	950 Main Street, Suite 1104	Hartford, CT	06103
Department of Administrative Services	165 Capitol Avenue	Hartford, CT	06106
Department of Labor	200 Folly Brook Boulevard	Wethersfield, CT	06109
Department of Social Services	25 Sigourney Street	Hartford, CT	06106
Department of Veterans Affairs	287 West Street	Rocky Hill, CT	06067
Diverse: Issues In Higher Education	10520 Warwick Avenue Suite B-8	Fairfax, VA	22030
Fairfield County Alpha Phi Alpha	50 Dexter Dr	Shelton, CT	06484
NAACP- National Headquarters	4805 Mt Hope Drive	Baltimore, MD	21215
CT State Asnuntuck	170 Elm Street	Enfield, CT	06082
CT State Capital	950 Main Street	Hartford, CT	06103
Central Connecticut State University	1615 Stanley Street	New Britain, CT	06050
Charter Oak State College	55 Paul J. Manafort Drive	New Britain, CT	06053
Eastern Connecticut State University	83 Windham Street	Willimantic, CT	06226
CT State Gateway	60 Sargent Drive	New Haven, CT	06511

Section 46a-68-80: EXTERNAL COMMUNICATION AND RECRUITMENT STRATEGIES

CT State Housatonic	900 Lafayette Boulevard	Bridgeport, CT	06604
CT State Manchester	Great Path, P.O Box 1046	Manchester, CT	06045
CT State Middlesex	100 Training Hill Road	Middletown, CT	06457
CT State Naugatuck Valley	750 Chase Parkway	Waterbury, CT	06708
CT State Northwestern	Park Place East	Winsted, CT	06098
CT State Norwalk	188 Richards Avenue	Norwalk, CT	06854
CT State Quinebaug Valley	742 Upper Maple Street	Danielson, CT	06239
Southern Connecticut State University	501 Crescent Street	New Heaven, CT	06515
CT State Three Rivers	574 London Turnpike	Norwich, CT	06360
CT State Tunxis	271 Scott Swamp Road	Farmington, CT	06032
University of Connecticut	115 N. Eagleville Road	Storrs, CT	06269
Western Connecticut State University	181 White Street	Danbury, CT	06810
The Chronicle of Higher Education	1255 23rd Street, NW, 7th fl	Washington, DC	20037
The New York Times	229 West 43rd Street	New York, NY	10036
The Hartford Courant	285 Broad Street	Hartford, CT	06115
La Voz Hispana	35 Elm Street	New Haven, CT	06510

Diversity Recruitment Resources

General Diversity Recruitment Links

Academic Diversity Search www.academicdiversitysearch.com
Affirmative Action Register www.aar-eeo.com
Big Ten Alliance – www.btaa.org
Black Perspective www.blackperspective.com
Diverse Issues in Higher Education www.diverseeducation.com
Diversity Directory www.diversitydirectory.org
Equal Opportunity Publications, Inc. www.eop.com
GoldSea - Asian American Daily www.goldsea.com
Higher Ed Jobs Online www.higheredjobs.com
Hire Diversity www.hirediversity.us
Hispanic Outlook in Higher Ed www.hispanicoutlook.com
Hispanic Today www.hispanic-today.com
Historically Black Colleges and Universities www.edonline.com/cq/hbcu
IM Diversity www.imdiversity.com
Journal of Blacks in Higher Education www.jbhe.com
MBA Careers www.MBACareers.com
NationJob Education Jobs Page www.nationjob.com/education
The Black Collegian Online www.diversityemployers.com
The Black E.O.E. Journal www.blackoejournal.com
University Jobs www.universityjobs.com
Women for Hire www.womenforhire.com
Women in Higher Education www.wihe.com
Workplace Diversity www.workplacediversity.com

Biology Diversity Recruitment Links

American Indian Science and Engineering Society www.aises.org
American Society for Biochemistry and Molecular Biology www.asbmb.org
HBCU's with Advanced Degrees in Biology www.edonline.com/cq/hbcu
Society for Advancement of Native Americans & Chicanos in Science www.sacnas.org
The American Society for Cell Biology www.ascb.org
The GEM Consortium www.gemfellowship.org

Business Administration Diversity Recruitment Links

Association of Latino Professionals in Finance and Accounting www.alpfa.org
Consortium for Graduate Study in Management www.cgsm.org
HBCU's with Advanced Degrees in Business www.edonline.com/cq/hbcu
National Association of Black Accountants, Inc www.nabainc.org
National Black MBA Association www.nbmbaa.org
National Economic Association www.neaecon.org
The Ph.D. Project www.phdproject.org

Chemistry Diversity Recruitment Links

American Association for Clinical Chemistry www.aacc.org
American Chemical Society Committee on Minority Affairs www.acs.org
American Indian Science and Engineering Society www.aises.org
C&E News: Diversity <http://pubs.acs.org/cen/education/7923/7923education2.html>
Chemical and Engineering News <http://pubs.acs.org/cen/index.html>
HBCU's with Advanced Degrees in Chemistry www.edonline.com/cq/hbcu
National Academy of Clinical Biochemistry www.nacb.org
National Organization for the Professional Advancement of Black Chemists and Chemical Engineers www.nobcche.org
Society for Advancement of Native Americans and Chicanos in Science www.sacnas.org

Clinical Science/Medicine Diversity Recruitment Links

American Association of Respiratory Care www.aarc.org
HBCU's with Advanced Degrees in Health Care Fields www.edonline.com/cq/hbcu
Medical Career Resource Center www.medbulletin.com
National Association of Health Services Executives www.nahse.org
National Medical Association www.nmanet.org
Nuclear Medicine Jobs www.nuclearmedicinejobs.com
Society of Nuclear Medicine and Molecular Imaging www.snmml.org

Computer Science & IT Diversity Recruitment Links

African American Women in Technology www.blackwomenintech.com
Black Data Processing Associates www.bdpa.org
Computer Scientists of the African Diaspora www.math.buffalo.edu/mad/computer-science/index.html
HBCU's with Advanced Degrees in Computer Science www.edonline.com/cq/hbcu
NAACP Diversity and High-Tech Career Fair www.naacpjobfinder.com
Society for Advancement of Native Americans and Chicanos in Science www.sacnas.org
The Association for Women in Computing www.awc-hq.org

Criminal Justice Diversity Recruitment Links

Academy of Criminal Justice Sciences www.acjs.org
ACJS: Minorities and Women Division www.acjs.org/page/MinoritiesandWomen
National Association of Blacks in Criminal Justice www.nabcj.org
National Criminal Justice Association www.ncja.org
HBCU's with Advanced Degrees in Criminal Justice www.edonline.com/cq/hbcu

Engineering Diversity Recruitment Links

American Indian Science and Engineering Society www.aises.org
Career Communications Group www.ccgmag.com

Guide for Successful Searches

HBCU's with Advanced Degrees in Engineering www.edonline.com/cq/hbcu

National Action Council for Minorities in Engineering, Inc www.nacme.org

National Society of Black Engineers www.nsbe.org

Society of Women Engineers www.swe.org

The Society of Hispanic Professional Engineers www.shpe.org

English/Writing Diversity Recruitment Links

Accrediting Council on Education in Journalism and Mass Communications www.acejmc.org

African American Literature and Culture Society www.aalcsblog.wordpress.com

Asian American Journalists Association www.aja.org

Association for Education in Journalism and Mass Communication www.aejmc.org

Association of LGBT Journalists www.nlgja.org

Association of Teachers of Technical Writing www.attw.org

Association for Women in Communications www.womcom.org

HBCU's with Advanced Degrees in English/Writing www.edonline.com/cq/hbcu

Journalism Education Association www.jea.org

Linguistic Programs www.linguistlist.org/home

National Association for Multi-Ethnicity in Communications www.namic.com

National Association of Hispanic Journalists www.nahj.org

National Hispanic Media Coalition www.nhmc.org

Native American Journalists Association Job Bank www.naja.com

New York Women in Communication www.nywici.org

Fine/Theater Arts Diversity Recruitment Links

Arts Council of the African Studies Association www.acasaonline.org

Association of Academic Museums and Galleries www.aamg-us.org

College Art Association www.collegeart.org

HBCU's with Advanced Degrees in Arts Fields www.edonline.com/cq/hbcu

National Art Education Association www.naea-reston.org

Women's Caucus for Art www.nationalwca.org

History Diversity Recruitment Links

American Historical Association www.historians.org

HBCU's with Advanced Degrees in History www.edonline.com/cq/hbcu

National Council for History Education www.ncheteach.org

OAH Committee on the Status of Minority Historians and Minority History www.oah.org

Mathematics Diversity Recruitment Links

American Mathematical Society www.ams.org

Black Women in Mathematics www.math.buffalo.edu/mad/wmad0.html

Conference for African American Researchers in the Mathematical Sciences (CAARMS)

Guide for Successful Searches

www.math.buffalo.edu/mad/CAARMS/CAARMS-index.html

HBCU Mathematics Departments Online www.math.buffalo.edu/mad/mad_HBCU.html

HBCU's with Advanced Degrees in Mathematics www.edonline.com/cq/hbcu

Mathematicians of the African American Diaspora www.math.buffalo.edu/mad/00.INDEXmad.html

National Association of Mathematics <http://www.math.buffalo.edu/mad/NAM/>

Society of Industrial and Applied Mathematics www.siam.org

Strengthening Underrepresented Minority Mathematics Achievement www.maa.org/programs-and-communities/outreach-initiatives/summa

The Mathematical Association of America www.maa.org

Nursing Diversity Recruitment Links

American Academy of Nursing www.aannet.org/home

American Association of Colleges of Nursing www.aacnnursing.org

American Nurses Association www.nursingworld.org

HBCU's with Advanced Degrees in Nursing/Medical Sciences www.edonline.com/cq/hbcu

MinorityNurse.com www.minoritynurse.com

National Association of Hispanic Nurses www.nahnnet.org

National Black Nurses Association www.nbna.org

NursingCenter www.nursingcenter.com

Philosophy Diversity Recruitment Links

American Association of Philosophy Teachers www.philosophyteachers.org

American Philosophical Association www.apaonline.org

HBCU's with Advanced Degrees in Philosophy www.edonline.com/cq/hbcu

Society for Women in Philosophy www.uh.edu/~cfreelan/SWIP

Physics Diversity Recruitment Links

American Association of Physics Teachers www.aapt.org

American Institute of Physics www.aip.org

American Physical Society www.aps.org

APS Education and Outreach on Minorities www.aps.org/programs/minorities/index.cfm

HBCU's with Advanced Degrees in Physics www.edonline.com/cq/hbcu

National Society of Black Physicists www.nsbp.org

Society for Advancement of Native Americans and Chicanos in Science www.sacnas.org

Political Science Diversity Recruitment Links

American Political Science Association www.apsanet.org

HBCU's with Advanced Degrees in Political Science www.edonline.com/cq/hbcu

Latino Caucus in Political Science www.apsalatinocaucus.com

Race, Ethnicity and Politics of the APSA www.apsarep.org

Psychology Diversity Recruitment Links

American Psychological Association www.apa.org
Association for Psychological Science www.psychologicalscience.org
Asian American Psychological Association www.aapaonline.org
Association of Black Psychologists www.abpsi.org
HBCU's with Advanced Degrees in Psychology www.edonline.com/cq/hbcu
International Association for Cross-Cultural Psychology www.iaccp.org
Society for the Teaching of Psychology www.teachpsych.org
Society of Indian Psychologists www.nativepsychs.org

Student Affairs Diversity Recruitment Links

American Academics for Higher Education www.aahe.org
American Association of University Women www.aauw.org
American College Personnel Association www.myacpa.org

re: 2022 OSC Affirmative Action Plan

From CannonKlemenz, Rebecca <rebecca.cannonklemenz@ctstate.edu>
Date Fri 6/16/2023 10:45 AM
To Morganti, Paul (COSC) <pmorganti@charteroak.edu>
Cc D'Agostino, Nicholas (College Office) <nicholas.dagostino@ctstate.edu>

June 20, 2023

Paul Morganti
AFSCME Local 1214
pmorganti@charteroak.edu

Dear Paul Morganti,

We wish to bring to your attention that the 2022 Charter Oak State College Affirmative Action plan is available for the union members to review.

The Charter Oak State College is an affirmative action/equal opportunity employer and, as such, hires individuals without regard for age, ancestry, color, national origin, gender identity or expression, genetic information, learning disability, marital status, intellectual disability, physical disability (including but not limited to blindness), present or past history of mental disability, prior criminal record, race, religious creed, sex (including pregnancy and sexual harassment), sexual orientation, retaliation for previously opposed discrimination or coercion, veteran status, members of Civil Air Patrol, and workplace hazards to reproductive systems unless the provisions of sections 46a(b), 46a-80(b) of the Connecticut General Statutes are controlling, or there is a bona fide occupation qualification excluding persons in one of the above protected groups.

We invite you and your members to review and comment upon the College's affirmative action plan, which is available online at the following link: [2022 Charter Oak State College Affirmative Action Plan](#). Should you have any questions regarding the affirmative action plan, please contact my office at 860-723-0727.

Sincerely,



Rebecca Cannon-Klemenz
(she, her, hers)

CSCU Equal Employment and Opportunity Specialist and ADA Coordinator Designee – CT State and System Office

RCannon@commnet.edu - Tel:860.723.0334 –Fax: 860.723.0080

CT STATE
COMMUNITY COLLEGE

Memorandum

To: Rafaella Ameida, Associate Controller

CC: Commission on Human Rights and Opportunities - Contract Compliance Unit
Michael Moriarty, CFO
Edward Klonoski, President

From: Meg Yetishefsky, Program Manager, Supplier Diversity Program

Date: October 28, 2022

Re: FY 2022-2023 Small/Minority Business Spending Report
Charter Oak State College

This memo is to inform you that the DAS, Supplier Diversity Unit has received your agency's FY22-23 S/MBE spending plan report outlining the agency adopted budget and subsequent funds available for S/MBE purchases for FY22-23.

As indicated in CGS, 4a-60g, twenty-five percent of the total value of the annual budget for all contracts (including construction, rehabilitation, or rehabilitation of public buildings, the construction and maintenance of highways and the purchasing of goods and services) shall be set-aside for Small Businesses and of that computed amount, twenty-five percent must be awarded to Minority Businesses Enterprises."

A review of the agency submission has indicated the following:
(Please note that the allowable deductions/exemptions have adjusted)

Line 1: Total Agency Adopted Budget for FY 23 :	\$	21,867,212
Line 2: Amount Available for S/MBE program : (after allowable deductions/exemptions)	\$	2,438,654
Line 3: 25% of Line 2 - total set aside for Small/Minority Business Enterprise :	\$	609,664
Line 4: 25% of Line 3 - total set aside for only Minority Business Enterprise :	\$	152,416

The commitment of each state agency and political subdivision to set aside opportunities for Small/Minority Businesses will assist in the economic growth of the Connecticut Small Minority Businesses community.

The DAS, specifically the Supplier Diversity Unit will continue to offer the training needed to each state agency and political subdivision to facilitate the compliance of their annual S/MBE goal. The DAS, Supplier Diversity representative assigned to your agency is Stan Kenton. Questions regarding the agency Small/Minority Business goal report should be directed to Stan Kenton at Stanley.Kenton@ct.gov or (860) 713-5241.

Attachment

FY23 CHARTER OAK STATE COLLEGE

AMOUNTS REQUESTED BY AGENCY

DESCRIPTION		Page-2 Federally Funded Expenditures	Page -3 Non- Purchasing Budgeted Exp.	Page-4 Statute Required Budgeted Exp.	Page-5 Requested Exemptions	Total Deductions + Exemptions
Total Agency Adopted Budget	\$ 21,867,212	\$ 300,000	\$17,418,183	\$ -	\$1,758,375	\$ 19,476,558
Budget Available for Small Contractor Program	\$ 2,390,654	Notes or Comments:				
Annual SBE Goal	\$ 597,664					
Annual MBE Goal	\$ 149,416					

AMOUNTS APPROVED BY DAS

DESCRIPTION		Page-2 Federally Funded Expenditures	Page -3 Non- Purchasing Budgeted Exp.	Page-4 Statute Required Budgeted Exp.	Page-5 Requested Exemptions	Total Deductions + Exemptions
Total Agency Adopted Budget	\$ 21,867,212	\$ 300,000	\$17,418,183	\$ -	\$1,710,375	\$ 19,428,558
Budget Available for Small Contractor Program	\$ 2,438,654	Notes or Comments: The exemption for Audit Services- Grant Thornton (\$48,000) was not approved. This service is customarily available by Small/Minority Business Enterprises.				
Annual SBE Goal	\$ 609,664					
Annual MBE Goal	\$ 152,416					

**Fiscal Year
2022-2023**

FY QUARTER PERIOD	2nd Quarter	In reporting data below, does your Agency utilize C.O.R.E.?	YES
<i>If not utilizing C.O.R.E. , DID YOU VALIDATE COMPANY AS A CURRENT SBE AND/OR MBE Yes___ No___</i>			NO

Agency Name:		Charter Oak State College	
Report Prepared by:		Rafaella Almeida	Agency Number:
CERTIFIED VENDORS ONLY		ACTUAL EXPENDITURES	
(A) Small Business Enterprise (SBE) OR Minority Business Enterprise (MBE) Vendor Name	(B) State Contract # OR P.O. #	(C) DAS Certified SBE/MBE AMOUNT	(D) MBE Category
INDEPENDENT ELEVATOR CO LLC	0000001948	\$ 675.00	S
INFOSHRED	PCARD	\$ 350.00	W
SADITZ	PCARD	\$ 4,130.99	S
SUBURBAN STATIONAIRS	PCARD	\$ 159.94	S
SBE/MBE TOTAL		\$ 5,315.93	

DEPARTMENT OF ADMINISTRATIVE SERVICES
SUPPLIER DIVERSITY PROGRAM

FISCAL YEAR

Back-Up Sheets require Totals for each MBE Category

SMALL/ MINORITY BUSINESS ENTERPRISE QUARTERLY REPORT

Fiscal Year Quarter

1ST / 2ND / 3RD / 4TH

Fiscal Year Period

2022-2023

ENTER THIS QTR-

Agency Name:	Charter Oak State College	Agency Number:	BORAA
Prepared by:	Rafaella Almeida	E-mail Address:	ralmeida@charteroak.edu
Tel. # -	860-515-3765	<i>Please submit a digital copy of this form to Joshua.Goldberg@ct.gov</i>	

1) TOTAL FUNDS AVAILABLE (ALL SOURCES) FROM YOUR ADOPTED BUDGET Page 1 (Summary Page) From The Annual Goals Calculations Report	\$ 21,867,212.00
2) Amount Available for Small/Minority Business Program after DAS APPROVED DEDUCTIONS/EXEMPTIONS	\$ 2,438,654.00
3) 25% of line # 2 Total - Set Aside - Small/Minority Business Enterprises (Combined)	\$ 609,664
4) 25% of line # 3 Total- Set Aside - Minority Business Enterprises only	\$ 152,416

	QUARTER	Number	YEAR TO DATE	Number
	TOTALS (\$)	Contracts	TOTALS (\$)	Contracts
5) Total Agency FY Expenditures for Purchases and Contracts	\$ 312,809.11	32	\$ 661,141.30	66
6) Total Agency FY Expenditures for Purchases and Contracts from Small and Minority Contractors. Combined TOTALS OF SBE AND MBE EXPENDITURES	\$ 5,315.93	4	\$ 15,339.66	13
7) Total Agency FY Expenditures for Purchases and Contracts from Minority Business Enterprises (MBE) only.				
A) American Indian (N)	\$ -			
B) Asian (A)	\$ -			
C) Black (B)	\$ -			
D) Disabled Individual (D)	\$ -			
E) Hispanic (H)	\$ -			
F) Iberian Peninsula (I)	\$ -			
G) Disabled American Indian (DN)	\$ -			
H) Disabled Asian American (DA)	\$ -			
I) Disabled Black American (DB)	\$ -			
J) Disabled Hispanic American (DH)	\$ -			
K) Disabled Iberian Peninsula American (DI)	\$ -			
L) Woman (W)	\$ 350.00	1	\$ 3,525.25	4
M) Woman American Indian (NW)	\$ -			
N) Woman Asian (AW)	\$ -			
O) Woman Black (BW)	\$ -			
P) Woman Disabled (DW)	\$ -			
Q) Woman Hispanic (HW)	\$ -			
R) Woman Iberian Peninsula (IW)	\$ -			
S) Disabled American Indian Woman (DNW)	\$ -			
T) Disabled Asian American Woman (DAW)	\$ -			
U) Disabled Black American Woman (DBW)	\$ -			
V) Disabled Hispanic American Woman (DHW)	\$ -			
W) Disabled Iberian Peninsula American Woman (DIW)	\$ -			
DisBE TOTAL (Lines D, G, H, I, J, K, P, S, T, U, V, & W)	\$ -		\$ -	
WBE TOTAL [Lines L - W]	\$ 350.00	1	\$ 3,525.25	4
MBE TOTAL {Lines A - W}	\$ 350.00		\$ 3,525.25	

**Fiscal Year
2022-2023**

FY QUARTER PERIOD	3rd Quarter	In reporting data below, does your Agency utilize C.O.R.E.?	YES
<i>If not utilizing C.O.R.E. , DID YOU VALIDATE COMPANY AS A CURRENT SBE AND/OR MBE YesX__ No__</i>			NO

Page - 2 (Back-Up)

DEPARTMENT OF ADMINISTRATIVE SERVICES
SUPPLIER DIVERSITY PROGRAM

FISCAL YEAR

Back-Up Sheets require Totals for each MBE Category

SMALL/ MINORITY BUSINESS ENTERPRISE QUARTERLY REPORT

Fiscal Year Quarter

1ST / 2ND / 3RD / 4TH

Fiscal Year Period

2022-2023

ENTER THIS QTR-

Agency Name:	Charter Oak State College	Agency Number:	BORAA
Prepared by:	Rafaella Almeida	E-mail Address:	ralmeida@charteroak.edu
Tel. # -	860-515-3765	<i>Please submit a digital copy of this form to Joshua.Goldberg@ct.gov</i>	

1) TOTAL FUNDS AVAILABLE (ALL SOURCES) FROM YOUR ADOPTED BUDGET Page 1 (Summary Page) From The Annual Goals Calculations Report	\$ 21,867,212.00
2) Amount Available for Small/Minority Business Program after DAS APPROVED DEDUCTIONS/EXEMPTIONS	\$ 2,438,654.00
3) 25% of line # 2 Total - Set Aside - Small/Minority Business Enterprises (Combined)	\$ 609,664
4) 25% of line # 3 Total- Set Aside - Minority Business Enterprises only	\$ 152,416

	QUARTER	Number	YEAR TO DATE	Number
	TOTALS (\$)	Contracts	TOTALS (\$)	Contracts
5) Total Agency FY Expenditures for Purchases and Contracts	\$ 282,009.08	24	\$ 943,150.38	90
6) Total Agency FY Expenditures for Purchases and Contracts from Small and Minority Contractors. Combined TOTALS OF SBE AND MBE EXPENDITURES	\$ 10,542.52	6	\$ 25,882.18	19
7) Total Agency FY Expenditures for Purchases and Contracts from Minority Business Enterprises (MBE) only.				
A) American Indian (N)	\$ -			
B) Asian (A)	\$ -			
C) Black (B)	\$ -			
D) Disabled Individual (D)	\$ -			
E) Hispanic (H)	\$ -			
F) Iberian Peninsula (I)	\$ -			
G) Disabled American Indian (DN)	\$ -			
H) Disabled Asian American (DA)	\$ -			
I) Disabled Black American (DB)	\$ -			
J) Disabled Hispanic American (DH)	\$ -			
K) Disabled Iberian Peninsula American (DI)	\$ -			
L) Woman (W)	\$ 1,850.41	2	\$ 5,375.66	6
M) Woman American Indian (NW)	\$ -			
N) Woman Asian (AW)	\$ -			
O) Woman Black (BW)	\$ -			
P) Woman Disabled (DW)	\$ -			
Q) Woman Hispanic (HW)	\$ -			
R) Woman Iberian Peninsula (IW)	\$ -			
S) Disabled American Indian Woman (DNW)	\$ -			
T) Disabled Asian American Woman (DAW)	\$ -			
U) Disabled Black American Woman (DBW)	\$ -			
V) Disabled Hispanic American Woman (DHW)	\$ -			
W) Disabled Iberian Peninsula American Woman (DIW)	\$ -			
DisBE TOTAL (Lines D, G, H, I, J, K, P, S,T,U, V, & W)	\$ -		\$ -	
WBE TOTAL [Lines L - W]	\$ 1,850.41	2	\$ 5,375.66	6
MBE TOTAL {Lines A - W}	\$ 1,850.41		\$ 5,375.66	

**Fiscal Year
2022-2023**

FY QUARTER PERIOD	4th Quarter	In reporting data below, does your Agency utilize C.O.R.E.?	YES
<i>If not utilizing C.O.R.E. , DID YOU VALIDATE COMPANY AS A CURRENT SBE AND/OR MBE YesX__ No_____</i>			NO

Agency Name:	Charter Oak State College		
Report Prepared by:	Rafaella Almeida	Agency Number:	
CERTIFIED VENDORS ONLY		ACTUAL EXPENDITURES	SPECIFY:
(A) Small Business Enterprise (SBE) OR Minority Business Enterprise (MBE) Vendor Name	(B) State Contract # OR P.O. #	(C) DAS Certified SBE/MBE AMOUNT	(D) MBE Category
RYAN BUSINESS SYSTEMS INC	0000001404	\$ 2,642.36	W
EXECUTIVE LANDSCAPING INC	0000002037	\$ 4,647.00	S
FLOW TECH INC	0000002024	\$ 3,655.00	S
INFOSHRED	PCARD	\$ 495.64	W
SANDITZ	PCARD	\$ 10,153.04	S
SUBURBAN STATIONAIRS	PCARD	\$ 719.56	S

DEPARTMENT OF ADMINISTRATIVE SERVICES
SUPPLIER DIVERSITY PROGRAM

FISCAL YEAR

Back-Up Sheets require Totals for each MBE Category

SMALL/ MINORITY BUSINESS ENTERPRISE QUARTERLY REPORT

Fiscal Year Quarter

1ST / 2ND / 3RD / 4TH

Fiscal Year Period

2022-2023

ENTER THIS QTR-

Agency Name:	Charter Oak State College	Agency Number:	BORAA
Prepared by:	Rafaella Almeida	E-mail Address:	ralmeida@charteroak.edu
Tel. # -	860-515-3765	<i>Please submit a digital copy of this form to Joshua.Goldberg@ct.gov</i>	

1) TOTAL FUNDS AVAILABLE (ALL SOURCES) FROM YOUR ADOPTED BUDGET Page 1 (Summary Page) From The Annual Goals Calculations Report	\$ 21,867,212.00
2) Amount Available for Small/Minority Business Program after DAS APPROVED DEDUCTIONS/EXEMPTIONS	\$ 2,438,654.00
3) 25% of line # 2 Total - Set Aside - Small/Minority Business Enterprises (Combined)	\$ 609,664
4) 25% of line # 3 Total- Set Aside - Minority Business Enterprises only	\$ 152,416

	QUARTER	Number	YEAR TO DATE	Number
	TOTALS (\$)	Contracts	TOTALS (\$)	Contracts
5) Total Agency FY Expenditures for Purchases and Contracts	\$ 936,855.47	35	\$ 1,880,005.85	125
6) Total Agency FY Expenditures for Purchases and Contracts from Small and Minority Contractors. Combined TOTALS OF SBE AND MBE EXPENDITURES	\$ 22,312.60	6	\$ 48,194.78	25
7) Total Agency FY Expenditures for Purchases and Contracts from Minority Business Enterprises (MBE) only.				
A) American Indian (N)	\$ -			
B) Asian (A)	\$ -			
C) Black (B)	\$ -			
D) Disabled Individual (D)	\$ -			
E) Hispanic (H)	\$ -			
F) Iberian Peninsula (I)	\$ -			
G) Disabled American Indian (DN)	\$ -			
H) Disabled Asian American (DA)	\$ -			
I) Disabled Black American (DB)	\$ -			
J) Disabled Hispanic American (DH)	\$ -			
K) Disabled Iberian Peninsula American (DI)	\$ -			
L) Woman (W)	\$ 3,138.00	2	\$ 8,513.66	8
M) Woman American Indian (NW)	\$ -			
N) Woman Asian (AW)	\$ -			
O) Woman Black (BW)	\$ -			
P) Woman Disabled (DW)	\$ -			
Q) Woman Hispanic (HW)	\$ -			
R) Woman Iberian Peninsula (IW)	\$ -			
S) Disabled American Indian Woman (DNW)	\$ -			
T) Disabled Asian American Woman (DAW)	\$ -			
U) Disabled Black American Woman (DBW)	\$ -			
V) Disabled Hispanic American Woman (DHW)	\$ -			
W) Disabled Iberian Peninsula American Woman (DIW)	\$ -			
DisBE TOTAL (Lines D, G, H, I, J, K, P, S,T,U, V, & W)	\$ -		\$ -	
WBE TOTAL [Lines L - W]	\$ 3,138.00	2	\$ 8,513.66	8
MBE TOTAL {Lines A - W}	\$ 3,138.00		\$ 8,513.66	

Memorandum

To: Rafaella Ameida, Associate Controller

CC: Commission on Human Rights and Opportunities - Contract Compliance Unit
Michael Moriarty, CFO
Edward Klonoski, President

From: Meg Yetishefsky, Program Manager, Supplier Diversity Program

Date: September 14, 2023

Re: FY 2023-2024 Small/Minority Business Spending Report
Charter Oak State College

This memo is to inform you that the DAS, Business Outreach Team has received your agency's FY23-24 S/MBE spending plan report outlining the agency adopted budget and subsequent funds available for S/MBE purchases for FY23-24.

As indicated in CGS, 4a-60g, twenty-five percent of the total value of the annual budget for all contracts (including construction, rehabilitation, or rehabilitation of public buildings, the construction and maintenance of highways and the purchasing of goods and services) shall be set-aside for Small Businesses and of that computed amount, twenty-five percent must be awarded to Minority Businesses Enterprises."

A review of the agency submission has indicated the following:
(Please note that the allowable deductions/exemptions have adjusted)

Line 1: Total Agency Adopted Budget for FY 24 :	\$	18,781,858
Line 2: Amount Available for S/MBE program : (after allowable deductions/exemptions)	\$	1,287,454
Line 3: 25% of Line 2 - total set aside for Small/Minority Business Enterprise :	\$	321,864
Line 4: 25% of Line 3 - total set aside for only Minority Business Enterprise :	\$	80,466

The commitment of each state agency and political subdivision to set aside opportunities for Small/Minority Businesses will assist in the economic growth of the Connecticut Small Minority Businesses community.

For FY 25 a new annual SBE/MBE goal reporting process will be implemented for all agencies. Agencies will be contacted to provide training on the new process prior to implementation. The DAS, Business Outreach Team representative assigned to your agency is Stan Kenton. Questions regarding the agency Small/Minority Business spending plan report should be directed to Stan Kenton at Stanley.Kenton@ct.gov or (860) 713-5241.

Attachment

FY24 CHARTER OAK STATE COLLEGE

AMOUNTS REQUESTED BY AGENCY

DESCRIPTION		Page-2 Federally Funded Expenditures	Page -3 Non- Purchasing Budgeted Exp.	Page-4 Statute Required Budgeted Exp.	Page-5 Requested Exemptions	Total Deductions + Exemptions
Total Agency Adopted Budget	\$ 18,781,858	\$ -	\$16,155,282	\$ -	\$1,589,822	\$ 17,745,104
Budget Available for Small Contractor Program	\$ 1,036,754	Notes or Comments:				
Annual SBE Goal	\$ 259,189					
Annual MBE Goal	\$ 64,797					

AMOUNTS APPROVED BY DAS

DESCRIPTION		Page-2 Federally Funded Expenditures	Page -3 Non- Purchasing Budgeted Exp.	Page-4 Statute Required Budgeted Exp.	Page-5 Requested Exemptions	Total Deductions + Exemptions
Total Agency Adopted Budget	\$ 18,781,858	\$ -	\$16,155,282	\$ -	\$1,339,122	\$ 17,494,404
Budget Available for Small Contractor Program	\$ 1,287,454	Notes or Comments: The exemption for Audit Services- Grant Thornton (\$250,700) was not approved. This service is customarily available by Small/Minority Business Enterprises.				
Annual SBE Goal	\$ 321,864					
Annual MBE Goal	\$ 80,466					

**Fiscal Year
2023-2024**

FY QUARTER PERIOD	1st Quarter	In reporting data below, does your Agency utilize C.O.R.E.?	YES
<i>If not utilizing C.O.R.E. , DID YOU VALIDATE COMPANY AS A CURRENT SBE AND/OR MBE Yes___ No___</i>			NO

Agency Name:		Charter Oak State College	
Report Prepared by:		Rafaella Almeida	Agency Number:
CERTIFIED VENDORS ONLY		ACTUAL EXPENDITURES	
(A) Small Business Enterprise (SBE) OR Minority Business Enterprise (MBE) Vendor Name	(B) State Contract # OR P.O. #	(C) DAS Certified SBE/MBE AMOUNT	(D) MBE Category
RYAN BUSINESS SYSTEMS INC	0000001404	\$ 2,431.92	W
EXECUTIVE LANDSCAPING INC	0000002055	\$ 3,820.00	S
ADVANCED CORPORATE NETWORK	0000028992	\$ 4,630.00	S
T&T LANDSCAPING LLC	0000002020	\$ 6,000.00	S
T&T LANDSCAPING LLC	0000002019	\$ 26,700.00	S
INFOSHRED	PCARD	\$ 588.28	W
SADITZ	PCARD	\$ 3,614.68	S
SUBURBAN STATIONAIRS	PCARD	\$ 1,465.43	S
SBE/MBE TOTAL		\$ 49,250.31	

DEPARTMENT OF ADMINISTRATIVE SERVICES
SUPPLIER DIVERSITY PROGRAM

FISCAL YEAR

Back-Up Sheets require Totals for each MBE Category

SMALL/ MINORITY BUSINESS ENTERPRISE QUARTERLY REPORT

Fiscal Year Quarter

1ST / 2ND / 3RD / 4TH

Fiscal Year Period

2023-2024

ENTER THIS QTR-

Agency Name:	Charter Oak State College	Agency Number:	BORAA
Prepared by:	Rafaella Almeida	E-mail Address:	ralmeida@charteroak.edu
Tel. # -	860-515-3765	<i>Please submit a digital copy of this form to Joshua.Goldberg@ct.gov</i>	

1) TOTAL FUNDS AVAILABLE (ALL SOURCES) FROM YOUR ADOPTED BUDGET Page 1 (Summary Page) From The Annual Goals Calculations Report	\$ 18,781,858.00
2) Amount Available for Small/Minority Business Program after DAS APPROVED DEDUCTIONS/EXEMPTIONS	\$ 1,287,454.00
3) 25% of line # 2 Total - Set Aside - Small/Minority Business Enterprises (Combined)	\$ 321,864
4) 25% of line # 3 Total- Set Aside - Minority Business Enterprises only	\$ 80,466

	QUARTER	Number	YEAR TO DATE	Number
	TOTALS (\$)	Contracts	TOTALS (\$)	Contracts
5) Total Agency FY Expenditures for Purchases and Contracts	\$ 308,656.32	24	\$ 308,656.32	24
6) Total Agency FY Expenditures for Purchases and Contracts from Small and Minority Contractors. Combined TOTALS OF SBE AND MBE EXPENDITURES	\$ 49,250.31	8	\$ 10,023.73	8
7) Total Agency FY Expenditures for Purchases and Contracts from Minority Business Enterprises (MBE) only.				
A) American Indian (N)	\$ -			
B) Asian (A)	\$ -			
C) Black (B)	\$ -			
D) Disabled Individual (D)	\$ -			
E) Hispanic (H)	\$ -			
F) Iberian Peninsula (I)	\$ -			
G) Disabled American Indian (DN)	\$ -			
H) Disabled Asian American (DA)	\$ -			
I) Disabled Black American (DB)	\$ -			
J) Disabled Hispanic American (DH)	\$ -			
K) Disabled Iberian Peninsula American (DI)	\$ -			
L) Woman (W)	\$ 3,020.20	2	\$ 3,020.20	2
M) Woman American Indian (NW)	\$ -			
N) Woman Asian (AW)	\$ -			
O) Woman Black (BW)	\$ -			
P) Woman Disabled (DW)	\$ -			
Q) Woman Hispanic (HW)	\$ -			
R) Woman Iberian Peninsula (IW)	\$ -			
S) Disabled American Indian Woman (DNW)	\$ -			
T) Disabled Asian American Woman (DAW)	\$ -			
U) Disabled Black American Woman (DBW)	\$ -			
V) Disabled Hispanic American Woman (DHW)	\$ -			
W) Disabled Iberian Peninsula American Woman (DIW)	\$ -			
DisBE TOTAL (Lines D, G, H, I, J, K, P, S,T,U, V, & W)	\$ -		\$ -	
WBE TOTAL [Lines L - W]	\$ 3,020.20	2	\$ 3,020.20	2
MBE TOTAL {Lines A - W}	\$ 3,020.20		\$ 3,020.20	

DEPARTMENT OF ADMINISTRATIVE SERVICES
SUPPLIER DIVERSITY PROGRAM

FISCAL YEAR

Back-Up Sheets require Totals for each MBE Category

SMALL/ MINORITY BUSINESS ENTERPRISE QUARTERLY REPORT

Fiscal Year Quarter

1ST / 2ND / 3RD / 4TH

Fiscal Year Period

2023-2024

ENTER THIS QTR-

Agency Name:	Charter Oak State College	Agency Number:	BORAA
Prepared by:	Rafaella Almeida	E-mail Address:	ralmeida@charteroak.edu
Tel. # -	860-515-3765	<i>Please submit a digital copy of this form to Joshua.Goldberg@ct.gov</i>	

1) TOTAL FUNDS AVAILABLE (ALL SOURCES) FROM YOUR ADOPTED BUDGET Page 1 (Summary Page) From The Annual Goals Calculations Report	\$ 18,781,858.00
2) Amount Available for Small/Minority Business Program after DAS APPROVED DEDUCTIONS/EXEMPTIONS	\$ 1,287,454.00
3) 25% of line # 2 Total - Set Aside - Small/Minority Business Enterprises (Combined)	\$ 321,864
4) 25% of line # 3 Total- Set Aside - Minority Business Enterprises only	\$ 80,466

	QUARTER	Number	YEAR TO DATE	Number
	TOTALS (\$)	Contracts	TOTALS (\$)	Contracts
5) Total Agency FY Expenditures for Purchases and Contracts	\$ 226,786.08	33	\$ 535,442.40	57
6) Total Agency FY Expenditures for Purchases and Contracts from Small and Minority Contractors. Combined TOTALS OF SBE AND MBE EXPENDITURES	\$ 38,810.28	12	\$ 48,834.01	20
7) Total Agency FY Expenditures for Purchases and Contracts from Minority Business Enterprises (MBE) only.				
A) American Indian (N)	\$ -			
B) Asian (A)	\$ -			
C) Black (B)	\$ -			
D) Disabled Individual (D)	\$ -			
E) Hispanic (H)	\$ -			
F) Iberian Peninsula (I)	\$ -			
G) Disabled American Indian (DN)	\$ -			
H) Disabled Asian American (DA)	\$ -			
I) Disabled Black American (DB)	\$ -			
J) Disabled Hispanic American (DH)	\$ -			
K) Disabled Iberian Peninsula American (DI)	\$ -			
L) Woman (W)	\$ 5,848.20	3	\$ 8,868.40	5
M) Woman American Indian (NW)	\$ -			
N) Woman Asian (AW)	\$ -			
O) Woman Black (BW)	\$ -			
P) Woman Disabled (DW)	\$ -			
Q) Woman Hispanic (HW)	\$ -			
R) Woman Iberian Peninsula (IW)	\$ -			
S) Disabled American Indian Woman (DNW)	\$ -			
T) Disabled Asian American Woman (DAW)	\$ -			
U) Disabled Black American Woman (DBW)	\$ -			
V) Disabled Hispanic American Woman (DHW)	\$ -			
W) Disabled Iberian Peninsula American Woman (DIW)	\$ -			
DisBE TOTAL (Lines D, G, H, I, J, K, P, S,T,U, V, & W)	\$ -		\$ -	
WBE TOTAL [Lines L - W]	\$ 5,848.20	3	\$ 8,868.40	5
MBE TOTAL {Lines A - W}	\$ 5,848.20		\$ 8,868.40	

DEPARTMENT OF ADMINISTRATIVE SERVICES
SUPPLIER DIVERSITY PROGRAM SMALL/ MINORITY BUSINESS ENTERPRISE QUARTERLY REPORT

**Fiscal Year
2023-2024**

BE SURE TO INCLUDE SUBTOTALS FOR EACH MINORITY CATEGORY!!!

FY QUARTER PERIOD	3rd Quarter	In reporting data below, does your Agency utilize C.O.R.E.?	YES
<i>If not utilizing C.O.R.E. , DID YOU VALIDATE COMPANY AS A CURRENT SBE AND/OR MBE Yes___ No___</i>			NO

Agency Name:	Charter Oak State College
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Report Prepared by:	Rafaella Almeida	Agency Number:	
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[illegible]

DEPARTMENT OF ADMINISTRATIVE SERVICES
SUPPLIER DIVERSITY PROGRAM

FISCAL YEAR

Back-Up Sheets require Totals for each MBE Category

SMALL/ MINORITY BUSINESS ENTERPRISE QUARTERLY REPORT

Fiscal Year Quarter

1ST / 2ND / 3RD / 4TH

Fiscal Year Period

2023-2024

ENTER THIS QTR-

Agency Name:	Charter Oak State College	Agency Number:	BORAA
Prepared by:	Rafaella Almeida	E-mail Address:	ralmeida@charteroak.edu
Tel. # -	860-515-3765	<i>Please submit a digital copy of this form to Joshua.Goldberg@ct.gov</i>	

1) TOTAL FUNDS AVAILABLE (ALL SOURCES) FROM YOUR ADOPTED BUDGET Page 1 (Summary Page) From The Annual Goals Calculations Report	\$ 18,781,858.00
2) Amount Available for Small/Minority Business Program after DAS APPROVED DEDUCTIONS/EXEMPTIONS	\$ 1,287,454.00
3) 25% of line # 2 Total - Set Aside - Small/Minority Business Enterprises (Combined)	\$ 321,864
4) 25% of line # 3 Total- Set Aside - Minority Business Enterprises only	\$ 80,466

	QUARTER	Number	YEAR TO DATE	Number
	TOTALS (\$)	Contracts	TOTALS (\$)	Contracts
5) Total Agency FY Expenditures for Purchases and Contracts	\$ 195,047.75	31	\$ 730,490.15	88
6) Total Agency FY Expenditures for Purchases and Contracts from Small and Minority Contractors. Combined TOTALS OF SBE AND MBE EXPENDITURES	\$ 58,751.71	12	\$ 107,585.72	40
7) Total Agency FY Expenditures for Purchases and Contracts from Minority Business Enterprises (MBE) only.				
A) American Indian (N)	\$ -			
B) Asian (A)	\$ -			
C) Black (B)	\$ -			
D) Disabled Individual (D)	\$ -			
E) Hispanic (H)	\$ -			
F) Iberian Peninsula (I)	\$ -			
G) Disabled American Indian (DN)	\$ -			
H) Disabled Asian American (DA)	\$ -			
I) Disabled Black American (DB)	\$ -			
J) Disabled Hispanic American (DH)	\$ -			
K) Disabled Iberian Peninsula American (DI)	\$ -			
L) Woman (W)	\$ 4,381.27	3	\$ 13,249.67	8
M) Woman American Indian (NW)	\$ -			
N) Woman Asian (AW)	\$ -			
O) Woman Black (BW)	\$ -			
P) Woman Disabled (DW)	\$ -			
Q) Woman Hispanic (HW)	\$ -			
R) Woman Iberian Peninsula (IW)	\$ -			
S) Disabled American Indian Woman (DNW)	\$ -			
T) Disabled Asian American Woman (DAW)	\$ -			
U) Disabled Black American Woman (DBW)	\$ -			
V) Disabled Hispanic American Woman (DHW)	\$ -			
W) Disabled Iberian Peninsula American Woman (DIW)	\$ -			
DisBE TOTAL (Lines D, G, H, I, J, K, P, S,T,U, V, & W)	\$ -		\$ -	
WBE TOTAL [Lines L - W]	\$ 4,381.27	3	\$ 13,249.67	8
MBE TOTAL {Lines A - W}	\$ 4,381.27		\$ 13,249.67	

Summary Report

Please note that these will be your FY2025 goals. Please remember that goals are always based on your previous Fiscal Year expenditures.

Summary	Expense Amount	SBE Goals	MBE Goals
All Funds	33,806,366.12	0.00	0.00
Federal Funds	12,054,813.00	0.00	0.00
Salaries and Wages	13,517,944.91	0.00	0.00
Deductions	6,671,341.18	0.00	0.00
Remaining Funds Available	1,562,267.03	390,566.76	97,641.69

Business Unit	SBE Goal	MBE Goal	YTD SBE Spent	YTD SBE %	*YTD MBE Spent	YTD MBE %	2024 Q 1				2024 Q 2				2024 Q 3				2024 Q 4			
							SBE Spent	SBE %	* MBE Spent	MBE %	SBE Spent	SBE %	* MBE Spent	MBE %	SBE Spent	SBE %	* MBE Spent	MBE %	SBE Spent	SBE %	* MBE Spent	MBE %
BORAA			140,554.64			17,885.23	43,581.92			2,431.92		37,637.42			5,415.88		164,146.74	2,382.87	(104,811.44)		7,654.56	

* Year To Date columns show data as of Accounting Quarter selected

Agency Expenditure CHRO - Page1

Time run: 7/31/2024 2:04:25 PM

Agency Expenditure (All Non-Capital)	Total - 2024 Q 4	# of Contracts - 2024 Q 4	Total - Year to Date	# of Contracts - Year to Date
Total Agency FY Expenditures for Purchases and Contracts	1,816,037.55	21	9,558,041.63	44

CHRO - Page 1

Time run: 7/31/2024 2:04:25 PM

	Total - 2024 Q 4	# of Contracts - 2024 Q 4	Total - Year to Date	# of Contracts - Year to Date
Combined TOTALS OF SBE AND MBE EXPENDITURES	(104,811.44)	3	140,554.64	9

MBE					
Payment Government Class	Category	Total - 2024 Q 4	# of Contracts - 2024 Q 4	Total - Year to Date	# of Contracts - Year to Date
Hispanic American Woman	HW	1,500.00	0	1,500.00	0
Woman	W	6,154.56	0	16,385.23	1
Grand Total		7,654.56	0	17,885.23	1

SBE					
Payment Government Class	Category	Total - 2024 Q 4	# of Contracts - 2024 Q 4	Total - Year to Date	# of Contracts - Year to Date
SBE	SBE	(112,466.00)	3	122,669.41	8
Grand Total		(112,466.00)	3	122,669.41	8
	Total - 2024 Q 4	# of Contracts - 2024 Q 4	Total - Year to Date	# of Contracts - Year to Date	
Total for Disabled Minority		0		0	
	Total - 2024 Q 4	# of Contracts - 2024 Q 4	Total - Year to Date	# of Contracts - Year to Date	
Total for Women Minority		7,654.56	0	17,885.23	1

CHRO - Page 2

Time run: 7/31/2024 2:04:25 PM

SBE/MBE Supplier Name	Type	Contract ID	PO ID	DAS Certified SBE/MBE Amount	Category
ADVANCED CORPORATE NETWORKING INC	Standard Voucher			-114886	SBE
ARTEGRIZ LLC	Standard Voucher		0000002223	1500	HW
FIRE EQUIPMENT HEADQUARTERS INC	Standard Voucher		0000002193	3726.45	W
INDEPENDENT ELEVATOR CO LLC	Standard Voucher	23COSC075	0000002141	600	SBE
PRO-7 FIRE PROTECTION LLC	Standard Voucher	24COSC016	0000002195	740	SBE
RYAN BUSINESS SYSTEMS INC	Standard Voucher		0000001404	2428.11	W
T & T COMPLETE LANDSCAPING LLC	Standard Voucher			0	SBE
T & T COMPLETE LANDSCAPING LLC	Standard Voucher	24COSC042	0000002215	1080	SBE
Grand Total				-104811.44	

AP Business Unit Accounting Year Accounting Quarter

BORAA 2025 2025 Q 1
Setaside MBE/SBE - Goals
(*Please note that MBE expenditures are part of the SBE expenditures)
Time run: 10/25/2024 12:28:06 PM

2025 Q 1										
Business Unit	SBE Goal	MBE Goal	YTD SBE Spent	YTD SBE %	*YTD MBE Spent	YTD MBE %	SBE Spent	SBE %	* MBE Spent	MBE %
BORAA			21,868.16		2,729.81		21,868.16		3,001.65	

* Year To Date columns shows data as of Accounting Quarter selected

Agency Expenditure CHRO - Page1
Time run: 10/25/2024 12:28:06 PM

Agency Expenditure (All Non-Capital)	Total - 2025 Q 1	# of Contracts - 2025 Q 1	Total - Year to Date	# of Contracts - Year to Date
Total Agency FY Expenditures for Purchases and Contracts	3,079,831.11	17	3,079,831.11	17

CHRO - Page 1

Time run: 10/25/2024 12:28:06 PM

	Total - 2025 Q 1	# of Contracts - 2025 Q 1	Total - Year to Date	# of Contracts - Year to Date
Combined TOTALS OF SBE AND MBE EXPENDITURES	21,868.16	2	21,868.16	2

MBE

Payment Government Class	Category	Total - 2025 Q 1	# of Contracts - 2025 Q 1	Total - Year to Date	# of Contracts - Year to Date
Woman	W	3,001.65	0	3,001.65	0
Grand Total		3,001.65	0	3,001.65	0

SBE

Payment Government Class	Category	Total - 2025 Q 1	# of Contracts - 2025 Q 1	Total - Year to Date	# of Contracts - Year to Date
SBE	SBE	18,866.51	2	18,866.51	2
Grand Total		18,866.51	2	18,866.51	2
	Total - 2025 Q 1		# of Contracts - 2025 Q 1	Total - Year to Date	# of Contracts - Year to Date
Total for Disabled Minority			0		0
	Total - 2025 Q 1		# of Contracts - 2025 Q 1	Total - Year to Date	# of Contracts - Year to Date
Total for Women Minority	2,729.81		0	2,729.81	0

CHRO - Page 2

Time run: 10/25/2024 12:28:06 PM

SBE/MBE Supplier Name	Type	Contract ID	PO ID	DAS Certified SBE/MBE Amount	Category
ADVANCED CORPORATE NETWORKING INC	Standard Voucher		0000002235	4,020.00	SBE
CARUSO ELECTRIC CO	Standard Voucher		0000002259	228.00	W
INDEPENDENT ELEVATOR CO LLC	Standard Voucher	23COSC075	0000002141	600.00	SBE
PRO-7 FIRE PROTECTION LLC	Standard Voucher		0000002229	4,250.00	SBE
RYAN BUSINESS SYSTEMS INC	Standard Voucher		0000001404	2,501.81	W
T & T COMPLETE LANDSCAPING LLC	Standard Voucher		0000002245	2,400.00	SBE
T & T COMPLETE LANDSCAPING LLC	Standard Voucher		0000002279	1,650.00	SBE
T & T COMPLETE LANDSCAPING LLC	Standard Voucher	24COSC042	0000002215	1,620.00	SBE
SANDITZ	PCARD			4,294.00	SBE
SUBURBAN	PCARD			32.51	SBE
INFOSHRED LLC	PCARD			271.84	W
Grand Total				21,868.16	

Section 46a-68-81
Assignment of
Responsibility

Section 46a-68-81: ASSIGNMENT OF RESPONSIBILITY and MONITORING

The ultimate responsibility for adherence to affirmative action and equal opportunity rests directly with the President, Edward Klonoski. To assure compliance, the President holds regular meetings with the college leadership, Human Resources, and the EEO designee focusing on the following:

1. Human relations and intergroup relations;
2. Non-discriminatory 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;
5. Identification of obstacles in meeting the goals of the Affirmative Action Plan.

Ms. Rebecca Cannon-Klemenz served as Charter Oak State College's Equal Employment Opportunity and Affirmative Action Officer during the plan year. The EEO Officer reports directly to the President on all matters concerning affirmative action, equal employment opportunity, diversity, equity, sexual harassment and discrimination. Some of the duties and responsibilities included:

- The development of the Affirmative Action Plan; including the maintenance and monitoring of the AA Plan;
- Initiating and maintaining contact with recruiting sources and organizations serving members of protected classes;
- Training and informing the college of developments in affirmative action/equal employment opportunity laws; and
- Mitigating any discriminatory conduct, investigating complaints and keeping the President and managerial staff aware of any changes with affirmative action/equal employment opportunity policies, laws and regulations.

In order to perform all necessary functions, the EEO Officer has access to all related records, files and material needed to develop the plan. During the last plan period, Ms. Rebecca Cannon-Klemenz handled AA/EEO duties and responsibilities and reported directly to the president on all EEO/AA matters at the College in accordance with the regulations.

The organizational structure has changed recently as Charter Oak State College hired Ms. Serina Julien, Human Resources Director, in January 2025. During the next plan year, Ms. Julien will handle the AA/EEO duties and responsibilities for the Charter Oak State College, and she will report directly to President Klonoski on matters concerning affirmative action, equal employment opportunity, diversity, equity, sexual harassment and discrimination.

Charter Oak State College's leadership will continue to assess the feasibility of establishing an employee advisory committee for the College consisting of a cross section of employees. An Advisory Committee has not been established as these functions are carried out through other committees, e.g., leadership committee.

The President evaluates and monitors the affirmative action performance of the managers, supervisors, faculty and other employees assigned affirmative action responsibilities subject to Chapters 67 and 68 of the Connecticut General Statutes; such performance will be considered in promotion and merit increase decisions.

No employee or student shall be coerced, intimidated, or retaliated against for the performance of any affirmative action/equal employment opportunity duties. If there is such an occurrence, it shall be brought directly to the attention of the President or Director of Human Resources. The President will be informed of

such incidents in consultation with Human Resources. Any employee so aggrieved may independently file a complaint with the Commission on Human Rights and Opportunities (CHRO) or Equal Employment Opportunity Commission (EEOC), provided that nothing shall preclude the College from disciplining or discharging an employee for just cause.

Charter Oak State College 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.

Charter Oak State College is committed to affirmative action and equal employment opportunity. Each person in the organization who plays a role in assisting in any responsibilities of the Affirmative Action Plan is given an overview of his/her obligations and responsibilities and is completely supported by the President. This is a listing of the employees with Charter Oak State College and the CSCU who have assisted in the development and implementation of the Affirmative Action Plan.

Affirmative Action Plan Team Responsibilities

<u>Name/Title</u>	<u>% of Time</u>	<u>Race/ Gender</u>	<u>Responsibility</u>
President Edward Klonoski	15	W/M	Appointing Authority, Oversees the AA/EEO responsibilities and program development & directly oversees staff and employee performance. Monitors budget.
VP of Admin/CFO Michael Moriarty	15	W/M	Oversees all administrative functions for the College, including, but not limited to, oversight of HR Shared Services functions, fiscal functions.
Provost/VP of Academic Affairs David Ferreira	15	W/M	Oversees the Academic Affairs functions and supports activities related to AA/EEO.
Director of Human Resources Serina Julien	5	B/F	Oversees all HR functions for COSC, will oversee EEO functions, recruitment and search process for College. HR also handles matters related to employee conduct, policy enforcement, and personnel management.
EEO Officer/EEO Team John-Paul Chaisson-Cardenas Nicolas D'Agostino Rebecca Cannon-Klemenz	5 5 15		100% of the EEO team is dedicated to EEO and Affirmative Action; EEO team performed these functions for CT State Community College, CSCU and Charter Oak State College during the reporting period. As the VP of DEI for CT State, Dr. Chaisson-Cardenas is the VP over EEO and oversaw EEO for CT State, SO and COSC. As the Director of EEO, Mr. D'Agostino oversees the day-to-day operations and EEO Compliance for CT State, SO and COSC during the reporting period.

			For COSC, Ms. Cannon-Klemenz oversaw and managed all AA/EEO compliance operations and functions, including but not limited to recruitment and search committee activities, discrimination complaints, provides records & data and handles mandatory reporting requirements.
CSCU Compliance Cameron Liston Jessica Cabanillas	5 10	W/M H/F	The Compliance team is dedicated to compliance operations and functions, including but not limited to discrimination complaints, provides records & data and handles mandatory reporting requirements. Mr. Cameron Liston, as Chief Compliance Officer, and Ms. Jessica Cabanillas, Director of Recruitment and Talent Acquisition, both worked with Charter Oak State College on the creation of the affirmative action plan.
Directors and Administrators Multiple Employee	10	Multiple	Oversees all personnel within the College and compliance with HR/EEO/AA and other policies and procedures for the effective management of personnel within the College.

Charter Oak State College has developed an internal reporting system to continually audit, monitor and evaluate programs essential for a successful Affirmative Action Plan. The College is aware that the success of the affirmative action program is tantamount to the leadership of the President and the collaborative efforts of the Human Resource staff and other managers, supervisors and the team that performed duties related to the development and implementation of the AA Plan.

The President holds meetings regularly to discuss the hiring and promotional activity, successful program development and the accomplishment of goals and any barriers in meeting goals. Key managers including, but not limited to, the Vice President for Administration/Chief Financial Officer and the Chief Academic Officer (who serves as the Diversity, Equity and Inclusion lead) are briefed on all current affirmative action and equal employment opportunity matters. Topics discussed include, but are not limited to, hiring, promotional and programmatic goals, the recruitment and search process and the formation of diverse search committees, diversity of staff and students, development of related programs, potential upward mobility opportunities, complaint investigations, and other related AA/EEO issues.

Each search committee includes members of protected classes as reflective of the workforce as best as possible. They are given their charge regarding affirmative action responsibilities prior to the commencement of their review and evaluation of the applicants that applied. They are briefed about the screening process, especially regarding the development of selection criteria, interview questions are created and approved prior to the interview process; and they are advised of guidelines that are in compliance with laws and regulations and legal questions to be considered for interview purposes.

EEO develops and issues an annual Affirmative Action Plan summary report containing the overall status of the program, results achieved toward established objectives, identification of any particular problems encountered and recommendations for corrective actions needed. This report and the AA Plan are reviewed with the President prior to submission. Subsequent updates and/or reports occur periodically throughout the reporting period.

From: D'Agostino, Nick <NDAgostino@commnet.edu <mailto:NDAgostino@commnet.edu>>
Sent: Wednesday, November 29, 2023 10:19 AM
To: Ed Klonoski <eklonoski@charteroak.edu <mailto:eklonoski@charteroak.edu>>
Cc: Chaisson-Cardenas, John Paul <JChaisson-Cardenas@commnet.edu <mailto:JChaisson-Cardenas@commnet.edu>>
Subject: FW: COSC - Assistant Director of Finance- Interview questions

Good Morning, President Klonoski:

There have been recent escalations to your level that that didn't seem to exist in the past.

John-Paul and I would like to coordinate a time in the near future to discuss the process and see how we might better be able to assist COSC.

Nick

Join on your computer, mobile app or room device

Click here to join the meeting <https://nam02.safelinks.protection.outlook.com/ap/t-59584e83/?url=https%3A%2F%2Fteams.microsoft.com%2F%2Fmeetup-join%2F19%253ameeting_e40420c90207%2522%257d&data=05%7C01%7CNDAGostino%40commnet.edu%7C2e9f155c4e2f47b604108dbf1076754%7C679df878277a496ac8dd99e58606dd9%7C0%7C0%7C

Meeting ID: 272 272 795 189
Passcode: mRKSSh

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Or call in (audio only)

+1 860-969-4056..125169737# <tel:+18609694056..125169737#> United States, Hartford

Phone Conference ID: 125 169 737#

Find a local number <<https://nam02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdialin.teams.microsoft.com%2F35318c7-4ebb-439f-a6aa-d926f5d9a2e1%3Fid%3D125169737&data=05%2FC01%7CNDAgostino%40conmmnet.edu%7C2E9f155c4e2f47b6040108dbf1076754%7C679df87277a496ac8dd99e58606dd9%7C0%&url=https%3A%2F%2Fsafelinks.protection.outlook.com/?url=https%3A%2F%2Fdialin.teams.microsoft.com%2F2Fusp%2Fpstnconferencing&data=05%2FC01%7CNDAgostino%40conmmnet.edu%7C2E9f155c4e2f47b6040108dbf1076754%7C679>>

Learn More <[https://nam02.safelinks.protection.outlook.com/?url=https%3A%2F%2Faka.ms%2FJoinTeamsMeeting&data=05%7C01%7CNDAgostino%40commnet.edu%7C2e9f155c4e2f47b6040108dbf1076754%7C679df8782774a96aac8dd995e@commnet.edu%7C%2E9F155C4E2F47B6040108DBF1076754%7C679DF8782774A96AAC8DD995E8606DDE97C07%7C638368786353744533%](https://nam02.safelinks.protection.outlook.com/?url=https%3A%2F%2Faka.ms%2FJoinTeamsMeeting&data=05%7C01%7CNDAgostino%40commnet.edu%7C2e9f155c4e2f47b6040108dbf1076754%7C679df8782774a96aac8dd995e@commnet.edu%7C%2E9F155C4E2F47B6040108DBF1076754%7C679DF8782774A96AAC8DD995E8606DDE97C07%7C638368786353744533%U.S.&data=05%7C01%7CNDAgostino%40commnet.edu%7C2e9f155c4e2f47b6040108dbf1076754%7C679DF8782774A96AAC8DD995E8606DDE97C07%7C638368786353744533%)>

From: [Brandee Stefano](#)
To: [Cannon-Klemen, Rebecca](#)
Cc: [D'Agostino, Nick](#)
Subject: RE: ADA Interactive Process
Date: Monday, November 27, 2023 12:58:52 PM
Attachments: [image005.png](#)

Hello, Rebecca – Here is the availability for President Klonoski and Mike Moriarty for this virtual meeting:

- Tuesday, 11/28 at 9:30am, 10am, or 10:30am
- Wednesday, 11/29 at 3pm, 3:30pm, or 4pm
- Thursday, 11/30 at 2pm, 2:30pm, or 3pm
- Friday, 12/1 – anytime between 2pm and 4pm

Thank you,

Brandee

Brandee Stefano

Executive Assistant, Offices of the President & CFO

Co-Chair, 50th Anniversary Committee

Charter Oak State College

185 Main Street

New Britain, CT 06051-2296

Phone: 860-515-3865

bstefano@charteroak.edu

www.charteroak.edu/50years



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From: Michael J. Moriarty <mjmoriarty@charteroak.edu>

Sent: Monday, November 27, 2023 12:52 PM

To: Cannon-Klemen, Rebecca <RCannon-Klemen@commnet.edu>; Ed Klonoski <eklonoski@charteroak.edu>

Cc: Nicholas D'Agostino - Commnet <NDAgostino@commnet.edu>; Brandee Stefano <bstefano@charteroak.edu>

Subject: RE: ADA Interactive Process

Brandee – can you assist in coordinating a time?

Thanks,

Mike

Michael Moriarty

Vice President for Administration & Chief Financial Officer
Charter Oak State College
(860) 515-3760

From: Cannon-Klemenzen, Rebecca <RCannon-Klemenzen@commnet.edu>

Sent: Monday, November 27, 2023 11:59 AM

To: Ed Klonoski <eklonoski@charteroak.edu>; Michael J. Moriarty <mjmoriarty@charteroak.edu>

Cc: Nicholas D'Agostino - Commnet <NDAgostino@commnet.edu>

Subject: re: ADA Interactive Process

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon, Colleagues:

We hope you are doing well. We have received a request from [REDACTED] for a request for a workplace accommodation. As such, please let me know when you are available to discuss further.

Thank you.



Rebecca Cannon-Klemenzen
(she, her, hers)

Equity and Civil Rights and Compliance Specialist and ADA Coordinator Designee – CT State and System Office

RCannon@commnet.edu - Tel: 860.723.0334 – Fax: 860.723.0080

CT STATE
COMMUNITY COLLEGE

From: [Ed Klonoski](#)
To: [Cannon-Klemenzen, Rebecca](#)
Cc: [Duluc, Luisa M](#); [Hogan, Maureen \(COSC\)](#); [D'Agostino, Nick](#); [Ferreira, David \(COSC\)](#)
Subject: Re: COSC- Assistant Coordinator- Early Childhood Education- Interview Questions review, and approval needed.
Date: Monday, November 27, 2023 6:48:14 AM
Attachments: [image001.png](#)

Thank you.

Ed

On Nov 26, 2023, at 7:22 PM, Cannon-Klemenzen, Rebecca
<RCannonKlemenzen@commnet.edu> wrote:

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These are approved. Sorry about the delay, it was stuck in my outbox.

R.J. Cannon-Klemenzen

From: Duluc, Luisa M <LDuluc@commnet.edu>
Sent: Monday, November 20, 2023 8:00 AM
To: Cannon-Klemenzen, Rebecca <RCannonKlemenzen@commnet.edu>
Cc: Hogan, Maureen (COSC) <mhogan@charteroak.edu>
Subject: COSC- Assistant Coordinator- Early Childhood Education- Interview Questions review, and approval needed.

Hello,

Attached are the interview questions that the committee has submitted for your review and approval.

Thank you,

Luisa

From: Maureen Hogan <mhogan@charteroak.edu>
Sent: Friday, November 17, 2023 1:50 PM
To: Duluc, Luisa M <LDuluc@commnet.edu>
Subject: RE: COSC- Assistant Coordinator- Early Childhood Education- All committee members successfully charged-your next steps.

Section 46a-68-82
Organizational Analysis

Section 46a-68-82: ORGANIZATIONAL ANALYSIS

The Job Title Classification Study for Charter Oak State College puts all jobs under positions with no opportunity for advancement because of the uniqueness of the responsibilities within each position. Thus, all job classifications are without promotional opportunity.

ADMINISTRATIVE POSITIONS (26 positions)

President

Executive 2, VP of Administration & Chief Financial Officer

Executive 1, Provost and VP of Academic Affairs

Executive 1, Chief Information Officer

Director 2, Admissions

Director 2, Academic Services

Director 2, Registrar

Director 2, Marketing & Public Relations

Director 1, Accessibility Services

Director 1, Financial Aid

Director 1, Institutional Advancement

Director 1, Institutional Effectiveness

Director 1, Bursar

Director 1, Masters in HCA/Hi

Director 1, Masters, Organizational Effectiveness & Leadership Program Director

Director 1, Health Sciences and Technology Program Director

Director 1, Early Childhood and Child Youth Development Program Director

Director 1, Controller

Director 1, Academic Programs

Director 1, Instructional Design

Director 1, Prior Learning Assessment

Director 1, RN/ADN to BS Program Director

Director 1, Bachelor Social Work

Director 1, Workforce Development

Director 1, HIM Director

Manager 1, Network Operations Director

PROFESSIONAL POSITIONS (40 positions)

Associate Director, Associate Registrar

Associate Director, Admissions (2 positions)

Associate Director, Programmer IV

Associate Director, Systems Administrator III

Associate Director of Enterprise (2 positions)

Assistant Director, Academic Services

Assistant Director, Bursar

Assistant Director, Financial Aid (vacant)

Section 46a-68-82: ORGANIZATIONAL ANALYSIS

Assistant Director, Instructional Designer
Assistant Director, Alternate Route to Certification in Early Childhood Education
Assistant Director, BSW Field Director (vacant)
Assistant Director, Technical Support Manager
Assistant Director, AVHS Coordinator & Instructional Designer
Assistant Director, Marketing, Technology and Communications
Professional 3, Executive Assistant to VP of Admin & CFO and the President
Senior Associate, Academic Counselor (5 positions)
Senior Associate, Academic and Career Navigator
Senior Associate, Admissions Counselor (3 positions)
Senior Associate, Financial Aid Counselor (2 positions)
Senior Associate, Associate Controller (2 positions)
Senior Associate, Enrollment Counselor
Senior Associate, Assistant Coordinator, ECE ARC (vacant)
Senior Associate, Instructional Design
Associate 2, Enrollment Services Associates (3 positions)
Associate 2, Assistant Bursar (2 positions)
Associate 2, Assistant Registrar (3 positions)
Associate 2, Assistant to the Provost
Associate 2, System Administrator II

PART-TIME POSITIONS (10 positions)

Associate Director, Associate Registrar
Assistant Director, Research Associate
Senior Associate, Marketing and Communications
Senior Associate, Academic Counselor
Senior Associate, Associate Bursar
Associate 2, Academic Programs
Associate 2, Registrar Office
Staff Assistant
University Assistant (2)

ADJUNCT FACULTY/TUTOR POSITIONS (285)

STUDENT WORKER POSITIONS (1)

Section 46a-68-82: ORGANIZATIONAL ANALYSIS

OCCUPATIONAL CATEGORY STUDY

CATEGORY

PAY SCALE

Administrator

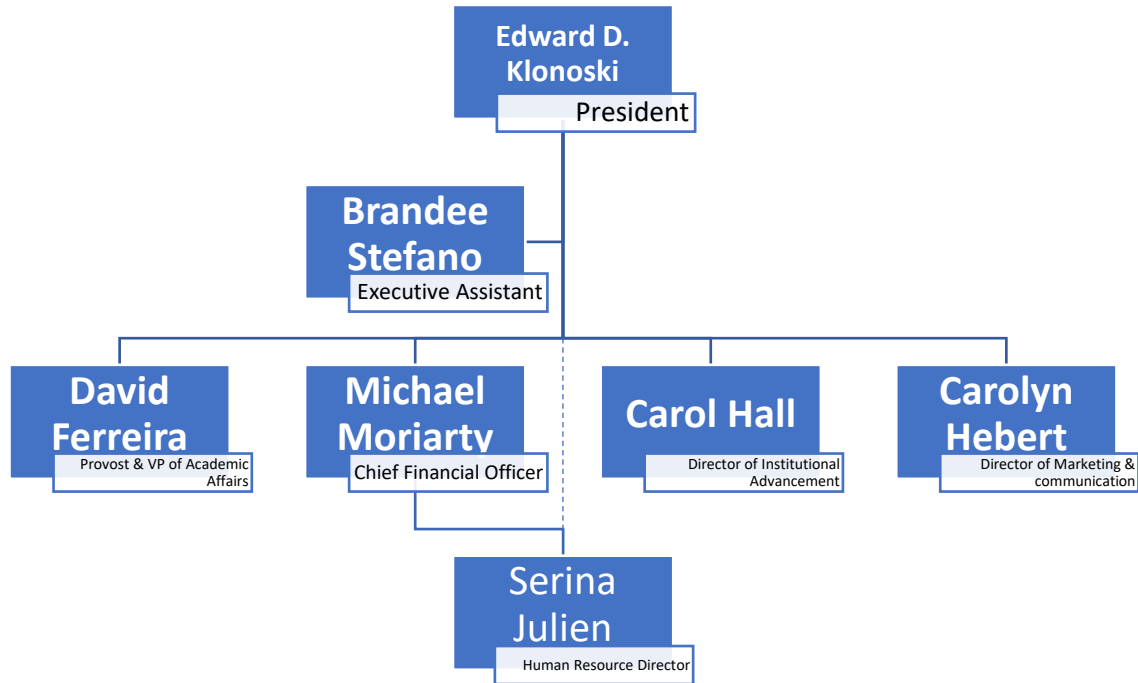
President	\$182,815 - no max
Executive 2	\$165,083 - \$247,624
Executive 1	\$140,721 - \$211,082
Director 2	\$109,049 - \$145,446
Director 1	\$94,873 - \$128,756
Manager 1	\$86,869 - \$130,303

Professional

Associate Director	\$81,325 - \$108,428
Assistant Director	\$74,546 - \$101,649
Professional 3	\$73,940 - \$83,182
Senior Associate	\$71,159 - \$96,567
Associate 2	\$62,688 - \$86,405
Associate 1	\$54,978 - \$75,347
Assistant 2	\$47,443 - \$64,380

CharterOak STATE COLLEGE

A Higher Degree of **Online** Learning



Section 46a-68-83
Workforce Analysis

Section 46a-68-83: WORKFORCE ANALYSIS

Subsection (a)

Charter Oak State College reported the racial and sexual composition of the full-time employees for each office, position and position classification identified in the job title study on forms provided by the Commission on Human Rights and Opportunities (CHRO). A separate analysis was completed for the part-time workforce. The workforce analysis shall inventory the following:

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(s), position(s) and position classification(s) within each occupational category;
3. Agency workforce in each labor market area by occupational category;
4. Agency workforce in each labor market area by office(s), position(s) and position classification(s) within each occupational category.

Subsection (b)

Charter Oak State College has also provided the Commission on Human Rights and Opportunities (CHRO) with an age grouping report of the full-time workforce by occupational category, in five (5) year increments as prescribed by the CHRO; and

Subsection (c)

Charter Oak State College has also provided the number of employees with disabilities in the full-time workforce by occupational category. One employee identified as disabled during the reporting period.

Form 83A

Form 83A

REPORTING DATE: November 30, 2024

[illegible]

WORKFORCE ANALYSIS
FULL-TIME WORKFORCE BY POSITION/JOB TITLE WITHIN OCCUPATIONAL CATEGORY

Form 83B

Charter Oak State College

REPORTING DATE: November 30, 2024

OCCUPATIONAL CATEGORY: EXECUTIVE/ADMINISTRATIVE/MANAGERIAL

JOB TITLES	GRAND	TOTAL		WHITE		BLACK		HISPANIC		AAIANHNP		2 OR MORE RACES	
	TOTAL	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Bursar	1	0	1						1				
VP of Admin and Chief Financial Officer	1	1	0	1									
Chief Information Officer	1	1	0	1									
Controller	1	1	0	1									
Coord, Early Childhood & Youth Educators	1	0	1		1								
Director Mktg & Public Relations	1	0	1		1								
Director of Admissions	1	0	1		1								
Director of Institutional Advancement	1	0	1		1								
Director of Institutional Effectiveness	1	1	0	1									
Director, Academic Services	1	0	1								1		
Director, Accessibility Services	1	0	1		1								
Director, Financial Aid	1	1	0	1									
Director, Health Science Technology	1	0	1		1								
Director, Instructional Design	1	1	0	1									
Director, Masters in HCA/BI	1	0	1								1		
Director, Masters in Org	1	1	0	1									
Director, Network Operations	1	1	0	1									
Director, Prior Learning Assessment	1	0	1		1								
Director, RN/ADN to BSN Program	1	0	1		1								
Director, Undergraduate Programs	1	0	1						1				
Director, Workforce Development	1	0	1		1								
HIM Director	1	0	1		1								
President	1	1	0	1									
Program Director, Bachelor Social Work	1	0	1				1						
Provost & VP of Academic Affairs	1	1	0	1									
Registrar	1	0	1		1								
EXECUTIVE TOTAL	26	10	16	10	11	0	1	0	2	0	2	0	0

	Charter Oak State College						REPORTING DATE:			November 30, 2024			
OCCUPATIONAL CATEGORY:	PROFESSIONAL, NON-FACULTY												
JOB TITLES	GRAND	TOTAL		WHITE		BLACK		HISPANIC		AAIANHNPI		2 OR MORE RACES	
	TOTAL	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Academic and Career Navigator	1	0	1		1								
Academic Counselor	5	0	5		5								
Admissions Counselor	3	1	2					1	1				1
Assistant Bursar	2	0	2		1		1						
Assistant Director, Academic Services	1	1	0			1							
Assistant Director, Bursar	1	0	1		1								
Assistant Director, Marketing Technologies	1	1	0	1									
Assistant Registrar	3	0	3		2				1				
Assistant to the Provost	1	1	0	1									
Associate Controller	2	1	1			1			1				
Associate Director of Enterprise	2	2	0	2									
Associate Director of Admissions	2	2	0	2									
Associate Registrar	1	1	0	1									
Asst. Coordinator, Alt Rte to Cert	1	0	1		1								
Asst. Director, Financial Aid	0	0	0										
AVHS Coordinator & Instructional Designer	1	0	1		1								

	Charter Oak State College					REPORTING DATE:		November 30, 2024					
OCCUPATIONAL CATEGORY:	PROFESSIONAL, NON-FACULTY												
JOB TITLES	GRAND	TOTAL		WHITE		BLACK		HISPANIC		AAIANHNPI		2 OR MORE RACES	
	TOTAL	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Enrollment Counselor	1	1	0	1									
Enrollment Services Associate	3	0	3		3								
Executive Asst, CFO & President	1	0	1		1								
Financial Aid Counselor	2	0	2		1		1						
HIM Associate	0	0	0										
Instructional Designer	1	0	1		1								
Programmer IV	1	1	0							1			
Sr. Assoc. Instructional Design	1	0	1		1								
System Administrator II	1	1	0	1									
System Administrator III	1	0	1		1								
Technical Support Manager	1	1	0	1									
PROFESSIONAL NON-FACULTY TOTAL	40	14	26	10	20	2	2	1	3	1	0	0	1
TOTAL STATEWIDE Workforce	66	24	42	20	31	2	3	1	5	1	2	0	1

Note: EEO and COSC leadership conducted an audit of leadership positions within COSC. Based on this review, 3 titles formerly classified PNF were moved into the executive EEO category.

WORKFORCE ANALYSIS
FULL-TIME WORKFORCE BY LABOR MARKET AREA

Form 83C

AGENCY: Charter Oak State College

REPORTING DATE: November 30, 2024

LABOR MARKET AREA: NATIONAL

OCCUPATIONAL CATEGORY	GRAND	TOTAL	TOTAL	WHITE		BLACK		HISPANIC		AAIANHNPI		2 OR MORE RACES	
	TOTAL	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Executive/Managerial	26	10	16	10	11	0	1	0	2	0	2	0	0
Professional	40	14	26	10	20	2	2	1	3	1	0	0	1
TOTAL	66	24	42	20	31	2	3	1	5	1	2	0	1

WORKFORCE ANALYSIS

Form 83D

FULL-TIME WORKFORCE BY POSITION/JOB TITLE WITHIN OCCUPATIONAL CATEGORY BY LABOR MARKET AREA

AGENCY: Charter Oak State College

REPORTING DATE: November 30, 2024

LABOR MARKET AREA NATIONAL

OCCUPATIONAL CATEGORY	JOB TITLE	GRAND	TOTAL	TOTAL	WHITE		BLACK		HISPANIC		AAIANHNPI		2 OR MORE RACES	
		TOTAL	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Executive/Managerial	Bursar	1	0	1						1				
	Chief Financial Officer	1	1	0	1									
	Chief Information Officer	1	1	0	1									
	Controller	1	1	0	1									
	Coord, Early Childhood & Yth Educ	1	0	1		1								
	Director Mktg & Public Relations	1	0	1		1								
	Director of Admissions	1	0	1		1								
	Director of Institutional Advanceme	1	0	1		1								
	Director of Institutional Effectivenes	1	1	0	1									
	Director, Academic Services	1	0	1								1		
	Director, Accessibility Services	1	0	1		1								
	Director, Financial Aid	1	1	0	1									
	Director, Health Science Tech	1	0	1		1								
	Director, Instructional Design	1	1	0	1									
	Director, Masters in HCA/HI	1	0	1								1		
	Director, Masters in Org	1	1	0	1									
	Director, Network Operations	1	1	0	1									
	Director, Prior Learning Assessmer	1	0	1		1								
	Director, RN/ADN to BSN Program	1	0	1		1								
	Director, Undergraduate Programs	1	0	1						1				
	Director, Workforce Development	1	0	1		1								
	HIM Director	1	0	1		1								
	President	1	1	0	1									
	Program Director, Bach Social Wor	1	0	1				1						
	Provost & VP of Academic Affairs	1	1	0	1									
	Registrar	1	0	1		1								
	Subtotal	26	10	16	10	11	0	1	0	2	0	2	0	0

OCCUPATIONAL CATEGORY	JOB TITLE	GRAND	TOTAL	TOTAL	WHITE		BLACK		HISPANIC		AAIANHNP		2 OR MORE RACES	
		TOTAL	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Professional Non-Faculty	Academic and Career Navigator	1	0	1		1								
	Academic Counselor	5	0	5		5								
	Admissions Counselor	3	1	2					1	1				1
	Assistant Bursar	2	0	2		1		1						
	Assistant Director, Academic Services	1	1	0			1							
	Assistant Director, Bursar	1	0	1		1								
	Assistant Director, Marketing Techn	1	1	0	1									
	Assistant Registrar	3	0	3		2				1				
	Assistant to the Provost	1	1	0	1									
	Associate Controller	2	1	1			1			1				
	Associate Director of Enterprise	2	2	0	2									
	Associate Director of Admissions	2	2	0	2									
	Associate Registrar	1	1	0	1									
	Asst. Coordinator, Alt Rte to Cert	1	0	1		1								
	Asst. Director, Financial Aid	0	0	0										
	AVHS Coord. & Instructional Design	1	0	1		1								
	Enrollment Counselor	1	1	0	1									
	Enrollment Services Associate	3	0	3		3								
	Executive Asst, CFO & President	1	0	1		1								
	Financial Aid Counselor	2	0	2		1		1						
	Instructional Designer	1	0	1		1								
	Programmer IV	1	1	0							1			
	Senior Assoc. Instructional Design	1	0	1		1								
	System Administrator II	1	1	0	1									
	System Administrator III	1	0	1		1								
	Technical Support Manager	1	1	0	1									
	Professional Subtotal	40	14	26	10	20	2	2	1	3	1	0	0	1
	National/Statewide TOTAL	66	24	42	20	31	2	3	1	5	1	2	0	1

Form 83E

Form 83E

REPORTING DATE: 11/30/2024

[illegible]

WORKFORCE ANALYSIS
DISABLED WORKFORCE

Form 83F

AGENCY: Charter Oak State College

REPORTING DATE: November 30, 2024

[illegible]

WORKFORCE ANALYSIS
TOTAL PART-TIME WORKFORCE

Form 83H

AGENCY: Charter Oak State College REPORTING DATE: November 30, 2024

OCCUPATIONAL CATEGORY	GRAND	TOTAL	TOTAL	WHITE		BLACK		HISPANIC		AAIANHNPI		2 OR MORE RACES	
	TOTAL	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
COSCAssoc Director	1	0	1		1								
COSC Adjunct Faculty	285	97	188	71	132	14	35	3	10	6	4	0	0
COSC Associate 2	2	0	2		1		1						
COSC Staff Assistant	1	1	0	1									
Temp Worker (Retiree)	14	4	10	3	9	1	1						
COSCStudent Worker	1	1	0	1									
COSC Assistant Director	1	0	1		1								
COSC Senior Associate	3	0	3		3								
SU Assistant	2	1	1	1					1				
TOTAL	310	104	206	77	147	15	37	3	11	6	4	0	0

Section 46a-68-84
Availability Analysis

Section 46a-68-84: AVAILABILITY ANALYSIS

Subsection (a)

As a preparatory step in determining whether protected classes are fully and fairly utilized in the workforce, Charter Oak State College conducted an analysis by occupational category to determine the availability base of protected group members for employment. A separate analysis will be conducted for position classifications in each occupational category that employs more than twenty-five (25) or more employees when necessary. A separate analysis can be performed 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 within an occupational category or, where appropriate, the job content of a position classification.
2. Identify the relevant labor market area.
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.

Subsection (b)

In calculating availability, the following information and data sources were referred to when developing this section of the Affirmative Action Plan.

1. Employment figures: 2014-2018 Census Data
2. The racial and sexual composition of persons in promotable and transferable offices, positions and position classifications: Promotable pools are used in some occupational categories where promotions occur.

Subsection (c)

In calculating availability, following information and data sources may be used when developing the Affirmative Action Plan.

1. Population figures;
2. Client Population figures;
3. Figures for Educational, technical and training program graduates and participants; the Digest of Educational Statistics - Table 314.40 and Table 315.20.
4. Any other relevant source.

Subsection (d)

For each occupational category, position classification or job title analyzed, Charter Oak State College's Affirmative Action Plan provides the name of each source consulted and each basis for selection of each source and copies of the specific data sources are included.

The Charter Oak State College's Affirmative Action Plan also documents the data source used and justifications for using them for each occupational category and includes the worksheets to detail the specific information used to create the Availability Analysis.

Section 46a-68-84: AVAILABILITY ANALYSIS

Subsection (e)

Any job title that had twenty-five (25) or more employees in an occupational category where only the entry level positions are fulfilled 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.

Subsection (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 that has been assigned to each source. The total weight for all sources cannot exceed one hundred percent (100%).

The percent of each race and sex group for each relevant source used in the College's Availability Analysis was multiplied by the weight given to the corresponding sources resulting in the 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.

Subsection (g)

The Affirmative Action Plan substantiated the manner in which the availability base is calculated. The worksheets of the sources used are included.

Subsection (h)

As part of its review, the Commission on Human Rights and Opportunities (CHRO) reserves the right to determine the appropriateness of information and data used in subsection of this section. CHRO also reserves the right to accept or reject such information or data used in the Affirmative Action Plan. The College with the consent of the Executive Director of the Commission on Human Rights and Opportunities (CHRO) may analyze additional labor market areas when specific requirements of the job profile, such as geography proximity, so require.

Charter Oak State College
AVAILABILITY ANALYSIS

OCCUPATIONAL CATEGORY:
JOB TITLE:

Executive
All titles

REPORTING DATE:
LABOR MARKET AREA:

11/30/2024
Statewide/National

AVAILABILITY SOURCE	TOTAL MALE			TOTAL FEMALE			WHITE MALE			WHITE FEMALE			BLACK MALE			BLACK FEMALE			HISPANIC MALE			HISPANIC FEMALE			AAIANHNPI* MALE			AAIANHNPI* FEMALE			TWO or MORE MALE			TWO or MORE FEMALE		
	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF
Employment data (Census)	38.1	30	11.4	61.9	30	18.6	29.2	30	8.8	50.3	30	15.1	3.2	30	1.0	3.8	30	1.1	3.2	30	1.0	5.2	30	1.6	1.5	30	0.5	1.9	30	0.6	1.1	30	0.3	0.6	30	0.2
Promotable Pool	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0
Part-Time Pool	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0
Other: Digest of Ed (National)	41.2	70	28.8	58.8	70	41.2	31.1	70	21.8	41.5	70	29.1	4.1	70	2.9	7.7	70	5.4	3.1	70	2.2	5.3	70	3.7	2.3	70	1.6	3.2	70	2.2	0.6	70	0.4	1.0	70	0.7
Other: None	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0
FINAL AVAILABILITY BASE PERCENTAGE			40.2			59.8			30.6			44.2			3.9			6.5			3.2			5.3			2.1			2.8			0.7			0.9

Employment Data - Census 2014-2018 EEO Data Tool, Statewide Data, Connecticut Education and Childcare Administrators (11-9030)

11-9030	13945	5315	8630	4070	7020	445	535	440	730	205	260	155	85
Total	13945	5315	8630	4070	7020	445	535	440	730	205	260	155	85
Percentage	100.0%	38.1%	61.9%	29.2%	50.3%	3.2%	3.8%	3.2%	5.2%	1.5%	1.9%	1.1%	0.6%

Promotable Pool

N/A	0	0	0	0	0	0	0	0	0	0	0	0	0
N/A	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0
Percentage	0	0	0	0	0	0	0	0	0	0	0	0	0

Part-Time Pool

N/A	0	0	0	0	0	0	0	0	0	0	0	0	0
Percentage	0	0	0	0	0	0	0	0	0	0	0	0	0

US Dept. Ed. National Center for Education Statistics, IPEDS, November 2022: Executive

Management	267497	110305	157192	83304	111043	11040	20633	8273	14151	6177	8679	1511	2686
Total	267497	110305	157192	83304	111043	11040	20633	8273	14151	6177	8679	1511	2686
Percentage	100.0%	41.2%	58.8%	31.1%	41.5%	4.1%	7.7%	3.1%	5.3%	2.3%	3.2%	0.6%	1.0%

Other source

	0	0	0										
Total	0	0	0	0	0	0	0	0	0	0	0	0	0
Percentage	0	0	0	0	0	0	0	0	0	0	0	0	0

FACTOR:	SOURCE CONSULTED:	BASIS OF SELECTION: GEOGRAPHICAL AREA/JOB TITLE:	REASONS FOR WEIGHTING THE FACTOR:
Employment data in the Applicable LMA	Employment Data - Census 2014-2018 EEO Data Tool, Statewide Data, Connecticut Education and Childcare Administrators (11-9030)	Statewide data utilized in this category.	30% value weight as Executive/Administrative positions require advanced degrees and relevant/current experience. With updated data - CT Executives utilized as many of our positions are filled by those employed in CT
Promotable	N/A	There are no promotable pool identified	N/A
Part-Time Workforce	N/A	Positions are filled by hires in this job title.	0% value weight.
Fall Student Populations	N/A	N/A	N/A
Digest of Ed. Statistics	US Dept. of Ed IPEDS Data November 2022-Table 314.40: Management	Positions are often filled by national searches for executive level positions. Management titles chosen as titles at the EEO 1 level are highly competitive and are often filled by those currently employed in similar positions.	70% Value weight as Executive/Administrative positions require advanced degrees and relevant/current experience. Most hires are recruited primarily through national searches and are often currently employed at the postsecondary level.

*AAIANHNPI = ASIAN, AMERICAN INDIAN, ALASKA NATIVE, HAWAIIAN NATIVE, PACIFIC ISLANDER

**Charter Oak State College
AVAILABILITY ANALYSIS**

OCCUPATIONAL CATEGORY:
JOB TITLE:

**Professional Non-Faculty
All Remaining Titles**

REPORTING DATE:
LABOR MARKET AREA:

**11/30/2024
Statewide/National**

AVAILABILITY SOURCE	TOTAL MALE			TOTAL FEMALE			WHITE MALE			WHITE FEMALE			BLACK MALE			BLACK FEMALE			HISPANIC MALE			HISPANIC FEMALE			AAIANHNPI* MALE			AAIANHNPI* FEMALE			TWO or MORE MALE			TWO or MORE FEMALE		
	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF	RS	VW	WF
Employment data (Census)	34.3	30	10.3	65.7	30	19.7	26.1	30	7.8	50.3	30	15.1	2.8	30	0.8	5.1	30	1.5	3.2	30	1.0	6.6	30	2.0	1.6	30	0.5	2.4	30	0.7	0.5	30	0.2	1.3	30	0.4
Promotable Pool	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0
Part-Time Pool	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0
Student Population	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0
Digest of Ed Stats (National)	32.1	70	22.5	67.9	70	47.5	22.3	70	15.6	45.2	70	31.6	3.7	70	2.6	8.4	70	5.9	3.3	70	2.3	7.7	70	5.4	2.2	70	1.5	5.1	70	3.6	0.6	70	0.4	1.5	70	1.1
Digest of Ed Stats (National)	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0
FINAL AVAILABILITY BASE PERCENTAGE			32.8			67.2			23.4			46.7			3.4			7.4			3.3			7.4			2.0			4.3			0.6			1.5

Employment Data - Census 2014-2018 EEO Data Tool, Statewide Data, Connecticut Other teachers and instructors, education, training, and library workers : 25-XXXX / 2350 & Education and childcare administrators : 11-9030 / 0230

25-XXXX/2350	15935	5010	10925	3740	8005	405	990	530	1235	285	460	50	235
11-9030/0230	13949	5245	8704	4070	7020	445	535	440	730	205	264	85	155
Total	29884	10255	19629	7810	15025	850	1525	970	1965	490	724	135	390
Percentage	100.0%	34.3%	65.7%	26.1%	50.3%	2.8%	5.1%	3.2%	6.6%	1.6%	2.4%	0.5%	1.3%

Promotable Pool													
N/A	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0
Percentage	0	0	0	0	0	0	0	0	0	0	0	0	0

Part-Time Pool -													
N/A	0	0	0	0	0	0	0	0	0	0	0	0	0
Percentage	0	0	0	0	0	0	0	0	0	0	0	0	0

OTHER SOURCE - N/A													
Total	0	0	0	0	0	0	0	0	0	0	0	0	0
Percentage	0	0	0	0	0	0	0	0	0	0	0	0	0

Digest of Ed. Statistics, Table 314.40, Fall 2022: Multiple Titles

Bus & Financial Ops	230878	61528	169350	42613	111057	6206	20908	6785	19523	4763	14374	1161	3488
Comm, Soc Svc, Leg, Arts etc.	195462	83776	111686	60236	75948	11098	13206	7447	13315	3265	6342	1730	2875
Healthcare Pract. And Tech	105364	28742	76622	18209	49337	2547	9201	2968	7955	4455	8783	563	1346
Librarians, Curators and Arch.	36207	10795	25412	8496	19246	652	2099	901	1818	588	1755	158	494
Stud. & Acad. Affs & Ed Svc.	163795	50143	113652	33885	75178	6511	16278	5757	13425	2947	6236	1043	2535
Total	731706	234984	496722	163439	330766	27014	61692	23858	56036	16018	37490	4655	10738
Percentage	100.0%	32.1%	67.9%	22.3%	45.2%	3.7%	8.4%	3.3%	7.7%	2.2%	5.1%	0.6%	1.5%

OTHER SOURCE - N/A													
	0	0	0	0	0	0	0	0	0	0	0	0	0
Percentage	0	0	0	0	0	0	0	0	0	0	0	0	0

FACTOR:	SOURCE CONSULTED:	BASIS OF SELECTION: GEOGRAPHICAL AREA/JOB TITLE:	REASONS FOR WEIGHTING THE FACTOR:
Employment data in the Applicable LMA	Employment Data - Census 2014-2018 EEO Data Tool, Statewide Data, Connecticut Other teachers and instructors, education, training, and library workers : 25-XXXX / 2350 & Education and childcare administrators : 11-9030 / 0230	The hiring area is statewide for this job category. Categories identified based on experience in higher education.	30% value weight as Professional Non-faculty positions are recruited from CT, often requiring previous and/or current work experience in the discipline/field.
Promotable	N/A		
Part-Time Workforce	N/A		
Fall Student Populations	N/A		
Digest of Ed. Statistics	Digest of Ed. Statistics, Table 314.40 - various administrative/professional positions.	The hiring area is statewide; however, we do recruit nationally and hire across statelines for various professional level positions.	70% value weight. Most hires are recruited primarily through statewide; however, some national and/or regional hires do occur.
Digest of Ed. Statistics	N/A		

*AAIANHNPI = ASIAN, AMERICAN INDIAN, ALASKA NATIVE, HAWAIIAN NATIVE, PACIFIC ISLANDER

CT State College Executive Availabilty Backup Data 2024

Note: Race categories with grey background indicate "Not Hispanic or Latino, One Race."

Enter Search Terms Here		Total All Groups	Hispanic or Latino	White alone	Black or African American n alone	American Indian /Alaska Native alone	Asian alone	Native Hawaiia n /Pacific Islander alone	Balance of not Hispanic or Latino	
Education and childcare administrators : 11-9030 / 0230	Total	13,950	1,170	11,090	980		4	465	0	240
Education and childcare administrators : 11-9030 / 0230	Male	5,315	440	4,070	445		0	205	0	155
Education and childcare administrators : 11-9030 / 0230	Female	8,630	730	7,020	535		4	260	0	85
Education and childcare administrators : 11-9030 / 0230	Percent Total	100.0%	8.4%	79.5%	7.0%		0.0%	3.3%	0.0%	1.7%
	Percent Male	38.1%	3.2%	29.2%	3.2%		0.0%	1.5%	0.0%	1.1%
Education and childcare administrators : 11-9030 / 0230	Percent Female	61.9%	5.2%	50.3%	3.8%		0.0%	1.9%	0.0%	0.6%

Source: 2014-2018 ACS 5-Year EEO Estimates

The table below is a summary of the above data

Title	Total	WM	WF	BM	BF	HM	HF	AM	AF	TM	TF	
Education and childcare administrators : 11-9030 / 0230	13,945	4,070	7,020	445	535		440	730	205	260	155	85
	13,945	4,070	7,020	445	535		440	730	205	260	155	85

Charter Oak State College

Availability Backup Data 2024

Connecticut EEO-ALL01R - Occupation by Sex and Race/Ethnicity for Residence Geography (Universe: Civilian labor force 16 years and over)
 Note: Race categories with grey background indicate "Not Hispanic or Latino, One Race."

Enter Search Terms Here

Education and childcare administrators : 11-9030 / 0230	Total	13,950	1,170	11,090	980	4	465	0	240
Education and childcare administrators : 11-9030 / 0230	Male	5,315	440	4,070	445	0	205	0	155
Education and childcare administrators : 11-9030 / 0230	Female	8,630	730	7,020	535	4	260	0	85
Education and childcare administrators : 11-9030 / 0230	Percent Total	100.0%	8.4%	79.5%	7.0%	0.0%	3.3%	0.0%	1.7%
Education and childcare administrators : 11-9030 / 0230	Percent Male	38.1%	3.2%	29.2%	3.2%	0.0%	1.5%	0.0%	1.1%
Education and childcare administrators : 11-9030 / 0230	Percent Female	61.9%	5.2%	50.3%	3.8%	0.0%	1.9%	0.0%	0.6%
Other teachers and instructors, education, training, and library workers : 25-XXXX / 2350	Total	15,935	1,765	11,740	1,395	10	735	0	285
Other teachers and instructors, education, training, and library workers : 25-XXXX / 2350	Male	5,010	530	3,740	405	0	285	0	50
Other teachers and instructors, education, training, and library workers : 25-XXXX / 2350	Female	10,925	1,235	8,005	990	10	450	0	235
Other teachers and instructors, education, training, and library workers : 25-XXXX / 2350	Percent Total	100.0%	11.1%	73.7%	8.8%	0.1%	4.6%	0.0%	1.8%
Other teachers and instructors, education, training, and library workers : 25-XXXX / 2350	Percent Male	31.4%	3.3%	23.5%	2.5%	0.0%	1.8%	0.0%	0.3%
Other teachers and instructors, education, training, and library workers : 25-XXXX / 2350	Percent Female	68.6%	7.8%	50.2%	6.2%	0.1%	2.8%	0.0%	1.5%

Source: 2014-2018 ACS 5-Year EEO Estimates

The table below is a summary of the above data

Title	Total	WM	WF	BM	BF	HM	HF	AM	AF	TM	TF
Other teachers and instructors, education	15,935	3,740	8,005	405	990	530	1,235	285	460	50	235
Education and childcare administrators : 11-9030 / 0230	13,949	4,070	7,020	445	535	440	730	205	264	85	155
	29,884	7,810	15,025	850	1,525	970	1,965	490	724	135	390

Table 314.40. Employees in degree-granting postsecondary institutions, by race/ethnicity, sex, employment status, control and level of institution, and primary occupation: Fall 2022

Sex, employment status, control and level of institution, and primary occupation	Total	American Indian/Alaska Native, Asian, Black, Hispanic, Pacific Islander, and Two or more races								White	Race/ethnicity unknown	Nonresident\1\
		Total	Percent\2\	American Indian/Alaska Native	Asian	Black	Hispanic	Pacific Islander	Two or more races			
1	2	3	4	5	6	7	8	9	10	11	12	13
All institutions	3,880,322	1,104,995	31.8	19,218	283,219	379,129	349,422	7,488	66,519	2,373,021	176,513	225,793
(instruction/research/public	1,507,641	368,475	26.9	6,682	133,072	112,055	93,538	2,599	20,529	999,329	79,870	59,967
Instruction	1,377,442	336,518	26.5	6,337	115,791	106,667	86,562	2,467	18,694	935,727	73,758	31,439
Research	96,598	22,384	34.9	195	13,120	2,885	4,794	79	1,311	41,789	4,857	27,568
Public service	33,601	9,573	30.5	150	4,161	2,503	2,182	53	524	21,813	1,255	960
Graduate assistants	398,862	88,419	36.5	914	31,744	18,292	27,453	396	9,620	153,778	21,453	135,212
archivists	37,664	8,461	23.4	219	2,049	2,751	2,715	75	652	27,742	1,203	258
Student and academic affairs and other education services	172,400	54,732	33.4	1,267	7,431	22,789	19,182	485	3,578	109,063	6,648	1,957
Management	276,746	73,150	27.3	1,367	13,028	31,673	22,424	461	4,197	194,347	7,833	1,416
operations	241,520	77,208	33.4	1,217	17,401	27,114	26,308	519	4,649	153,670	8,577	2,065
science	245,364	72,456	32.7	1,050	29,177	16,185	21,025	379	4,640	149,047	9,572	14,289
legal, arts, design, entertainment, sports, and media	205,838	59,278	30.3	1,170	7,768	24,304	20,762	669	4,605	136,184	8,887	1,489
technicians	115,166	37,818	35.9	324	12,778	11,748	10,923	136	1,909	67,546	6,178	3,624
Service occupations	221,083	102,196	48.9	1,861	9,053	47,499	39,866	678	3,239	106,758	10,036	2,093
Sales and related occupations	10,683	3,993	39.7	97	370	1,829	1,318	44	335	6,071	569	50
support	362,015	135,491	39.1	2,274	17,332	53,560	54,078	824	7,423	211,414	12,117	2,993
Natural resources, construction, and maintenance	67,986	17,334	26.7	623	1,470	6,519	7,701	165	856	47,505	2,860	287
Production, transportation, and material moving	17,354	5,984	36.2	153	546	2,811	2,129	58	287	10,567	710	93
Male	1,708,740	446,421	29.8	8,010	129,793	139,662	139,823	3,289	25,844	1,050,823	82,198	129,298
(instruction/research/public	731,113	169,707	25.8	2,978	69,913	43,158	43,923	1,158	8,577	486,912	38,865	35,629
Instruction	661,867	154,283	25.4	2,855	60,640	41,138	40,761	1,089	7,800	453,814	35,741	18,029
Research	53,582	11,268	33.1	76	7,212	1,155	2,207	46	572	22,739	2,530	17,045
Public service	15,664	4,156	28.6	47	2,061	865	955	23	205	10,359	594	555
Graduate assistants	196,558	38,563	35.8	372	15,263	6,812	11,927	187	4,002	69,092	10,252	78,651
archivists	11,266	2,299	21.3	56	512	652	901	20	158	8,496	382	89
other education services	53,306	16,258	32.4	374	2,386	6,511	5,757	187	1,043	33,885	2,356	807
Management	114,505	27,001	24.5	536	5,424	11,040	8,273	217	1,511	83,304	3,514	686
operations	64,945	18,915	30.7	314	4,301	6,206	6,785	148	1,161	42,613	2,765	652
science	143,475	38,475	29.6	601	14,646	8,426	11,964	243	2,595	91,483	5,450	8,067

legal, arts, design, entertainment, sports, and media	88,771	23,540	28.1	458	2,491	11,098	7,447	316	1,730	60,236	4,337	658
technicians	32,801	10,533	36.6	82	4,331	2,547	2,968	42	563	18,209	2,244	1,815
Service occupations	124,707	53,357	45.2	1,130	4,566	25,673	19,800	393	1,795	64,780	5,647	923
Sales and related occupations	3,536	1,202	36.1	30	116	545	391	22	98	2,132	180	22
support	67,346	26,362	41.7	395	4,124	9,147	10,900	158	1,638	36,927	3,050	1,007
and maintenance	62,217	15,480	26.0	561	1,259	5,721	7,029	152	758	43,947	2,568	222
material moving	14,194	4,729	34.9	123	461	2,126	1,758	46	215	8,807	588	70
Female	2,171,582	658,574	33.2	11,208	153,426	239,467	209,599	4,199	40,675	1,322,198	94,315	96,495
(instruction/research/public	776,528	198,768	27.9	3,704	63,159	68,897	49,615	1,441	11,952	512,417	41,005	24,338
Instruction	715,575	182,235	27.4	3,482	55,151	65,529	45,801	1,378	10,894	481,913	38,017	13,410
Research	43,016	11,116	36.8	119	5,908	1,730	2,587	33	739	19,050	2,327	10,523
Public service	17,937	5,417	32.1	103	2,100	1,638	1,227	30	319	11,454	661	405
Graduate assistants	202,304	49,856	37.1	542	16,481	11,480	15,526	209	5,618	84,686	11,201	56,561
archivists	26,398	6,162	24.3	163	1,537	2,099	1,814	55	494	19,246	821	169
other education services	119,094	38,474	33.9	893	5,045	16,278	13,425	298	2,535	75,178	4,292	1,150
Management	162,241	46,149	29.4	831	7,604	20,633	14,151	244	2,686	111,043	4,319	730
operations	176,575	58,293	34.4	903	13,100	20,908	19,523	371	3,488	111,057	5,812	1,413
science	101,889	33,981	37.1	449	14,531	7,759	9,061	136	2,045	57,564	4,122	6,222
legal, arts, design, entertainment, sports, and media	117,067	35,738	32.0	712	5,277	13,206	13,315	353	2,875	75,948	4,550	831
technicians	82,365	27,285	35.6	242	8,447	9,201	7,955	94	1,346	49,337	3,934	1,809
Service occupations	96,376	48,839	53.8	731	4,487	21,826	20,066	285	1,444	41,978	4,389	1,170
Sales and related occupations	7,147	2,791	41.5	67	254	1,284	927	22	237	3,939	389	28
support	294,669	109,129	38.5	1,879	13,208	44,413	43,178	666	5,785	174,487	9,067	1,986
and maintenance	5,769	1,854	34.3	62	211	798	672	13	98	3,558	292	65
material moving	3,160	1,255	41.6	30	85	685	371	12	72	1,760	122	23

†Not applicable.

\1\Race/ethnicity not collected.

\2\Combined total of staff who were American Indian/Alaska Native, Asian, Black, Hispanic, Pacific Islander, and of Two or more races as a percentage of total staff, excluding race/ethnicity unknown and nonresidents.

NOTE: Data in this table represent the 50 states and the District of Columbia. Data are for degree-granting institutions and U.S. service academies. Degree-granting institutions grant associate's or higher degrees and participate in Title IV federal financial aid programs. By definition, all graduate assistants are part time. Race categories exclude persons of Hispanic ethnicity.

SOURCE: U.S. Department of Education, National Center for Education Statistics, Integrated Postsecondary Education Data System (IPEDS), Human Resources component, Spring 2023 (provisional data). (This table was prepared December 2023.)

Section 46a-68-85
Utilization Analysis

Section 46a-68-85: UTILIZATION ANALYSIS AND HIRING & PROMOTIONAL GOALS

Subsection (a)

To determine whether protected classes are fully and fairly utilized, the representation of protected group populations in the workforce shall be compared. The form and format prescribed by the Commission on Human Rights and Opportunities (CHRO) staff, to the availability of such persons for employment. Comparisons between the COSC's workforce and the availability base calculated in the Availability Analysis Section 46a-68-84 of the Connecticut State Regulations shall be done by occupational category, position classifications employing a significant number of persons and job titles for which a separate base was calculated.

Subsection (b)

For each instance of underutilization identified in the Utilization Analysis, employment goals will be set to increase representation of protected class members in the Charter Oak State College workforce. The region shall set employment goals 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.

Subsection (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 sex groups, considered collectively is fifty percent (50%) or greater, a goal shall be set 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.

Charter Oak State College

UTILIZATION ANALYSIS

AGENCY:

Charter Oak State College

REPORTING DATE:

11/30/2024

CATEGORY OR CLASS:

EEO1 -EXECUTIVE

LABOR MARKET AREA:

STATEWIDE/NATIONAL

POSITION CLASSIFICATION (25+):

All titles

		GRAND TOTAL	TOTAL MALE	TOTAL FEMALE	WHITE		BLACK		HISPANIC		AAIANHNPI*		TWO or MORE		
					MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	
WORKFORCE %		100.0%	38.5%	61.5%	38.5%	42.3%	0.0%	3.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	A
WORKFORCE PARITY %		100.0	40.2	59.8	30.6	44.2	3.9	6.5	3.2	5.3	2.1	2.8	0.7	0.9	B
WORKFORCE NOS.		26	10	16	10	11	0	1	0	2	0	2	0	0	C
WORKFORCE PARITY NOS.			10.5	15.5	8.0	11.5	1.0	1.7	0.8	1.4	0.5	0.7	0.2	0.2	D
NET UTILIZATION (+/-)			-0.5	0.5	2.0	-0.5	-1.0	-0.7	-0.8	0.6	-0.5	1.3	-0.2	-0.2	E
PREVIOUS UTILIZATION			1.6	-1.6	3.3	-3.0	-0.7	-1.1	-0.5	1.1	-0.4	1.5	-0.1	-0.1	F
*** Enter line E from previous filing															
HIRING GOALS	PREVIOUS PLAN GOALS	7	3	4	0	3	1	1	1	0	1	0	0	0	G
	CURRENT PLAN HIRES	3	1	2	1	1	0	1	0	0	0	0	0	0	H
	CURRENT PLAN GOALS	5	3	2	0	1	1	1	1	0	1	0	0	0	L
PROMOTIONAL GOALS	PREVIOUS PLAN GOALS	0	0	0	0	0	0	0	0	0	0	0	0	0	J
	CURRENT PLAN PROMOTIONS	3	0	3	0	3	0	0	0	0	0	0	0	0	K
	CURRENT PLAN GOALS	0	0	0	0	0	0	0	0	0	0	0	0	0	L
UPWARD/ CAREER MOBILITY GOALS	PREVIOUS PLAN GOALS	0	0	0	0	0	0	0	0	0	0	0	0	0	M
	CURRENT PLAN PROMOTIONS	0	0	0	0	0	0	0	0	0	0	0	0	0	N
	CURRENT PLAN GOALS	0	0	0	0	0	0	0	0	0	0	0	0	0	O
NOTE:															

*AAIANHNPI = ASIAN, AMERICAN INDIAN, ALASKA NATIVE, HAWAIIAN NATIVE, PACIFIC ISLANDER

Charter Oak State College

UTILIZATION ANALYSIS

AGENCY: Charter Oak State College
CATEGORY OR CLASS: Professional Non-Faculty
POSITION CLASSIFICATION (25+): All Remaining Titles

REPORTING DATE: 11/30/2024
LABOR MARKET AREA: STATEWIDE/NATIONAL

		GRAND TOTAL	TOTAL MALE	TOTAL FEMALE	WHITE		BLACK		HISPANIC		AAIANHNPI*		TWO or MORE	
					MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
WORKFORCE %		100.0%	35.0%	65.0%	25.0%	50.0%	5.0%	5.0%	2.5%	7.5%	2.5%	0.0%	0.0%	2.5%
WORKFORCE PARITY %		100.0	32.8	67.2	23.4	46.7	3.4	7.4	3.3	7.4	2.0	4.3	0.6	1.5
WORKFORCE NOS.		40	14	26	10	20	2	2	1	3	1	0	0	1
WORKFORCE PARITY NOS.			13.1	26.9	9.4	18.7	1.4	3.0	1.3	3.0	0.8	1.7	0.2	0.6
NET UTILIZATION (+/-)			0.9	-0.9	0.6	1.3	0.6	-1.0	-0.3	0.0	0.2	-1.7	-0.2	0.4
PREVIOUS UTILIZATION			0.6	-0.6	0.5	1.1	0.5	-0.2	-0.4	0.0	0.1	-1.8	-0.3	0.4
*** Enter line E from previous filing														
HIRING GOALS	PREVIOUS PLAN GOALS	3	1	2	0	0	0	0	1	0	0	2	0	0
	CURRENT PLAN HIRES	8	2	6	1	3	1	2	0	1	0	0	0	0
	CURRENT PLAN GOALS	4	1	3	0	0	0	1	1	0	0	2	0	0
PROMOTIONAL GOALS	PREVIOUS PLAN GOALS	0	0	0	0	0	0	0	0	0	0	0	0	0
	CURRENT PLAN PROMOTIONS	0	0	0	0	0	0	0	0	0	0	0	0	0
	CURRENT PLAN GOALS	0	0	0	0	0	0	0	0	0	0	0	0	0
UPWARD/ CAREER MOBILITY GOALS	PREVIOUS PLAN GOALS	0	0	0	0	0	0	0	0	0	0	0	0	0
	CURRENT PLAN PROMOTIONS	0	0	0	0	0	0	0	0	0	0	0	0	0
	CURRENT PLAN GOALS	0	0	0	0	0	0	0	0	0	0	0	0	0
NOTE:														

*AAIANHNPI = ASIAN, AMERICAN INDIAN, ALASKA NATIVE, HAWAIIAN NATIVE, PACIFIC ISLANDER

Section 46a-68-86
Employment Analysis

Section 46a-68-86: EMPLOYMENT ANALYSES

The Charter Oak State College has undertaken 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. The agency has conducted the following analyses to ensure compliance with the regulations:

- 1) The College 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. Please note that there are applicants who maintain their race and sex confidential and for this reason many candidates on the Applicant Flow chart are recorded as either unknown male, unknown female and unknown unknown (if the sex is not provided). On the charts, the Total Male Column is adding the unknown males and the Total Female Column is adding the unknown females. The Grand Total Column is adding the additional unknown race and sex applicants since they cannot be added directly to the Total Male or Total Female Columns because it was not known if they were male or female but needed to be included into the Grand Total to show all applicants. Information is also provided for all reductions in the workforce on the Employment Process Analysis form.
- 3) Each agency shall further provide information by occupational category on all matters involving personnel evaluations, discipline or other reductions in workforce. A summary of performance evaluations that occurred in the reporting period are included in this section.

Charter Oak State College
EMPLOYMENT PROCESS ANALYSIS

OCCUPATIONAL CATEGORY: Executive
 POSITION OR POSITION CLASSIFICATION: All titles
 LABOR MARKET AREA: Statewide/National
 DATE: November 30, 2024

EMPLOYMENT PROCESS ANALYSIS	GRAND TOTAL	TOTAL		WHITE		BLACK		HISPANIC		AAIANHNPI*		TWO or MORE	
		MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Workforce Number Current Filing	26	10	16	10	11	0	1	0	2	0	2	0	0
Workforce Number Prior Filing	18	9	9	9	5	0	0	0	2	0	2	0	0
Net Change(+or-)	8	1	7	1	6	0	1	0	0	0	0	0	0
Hires (including PT to FT)	3	1	2	1	1	0	1	0	0	0	0	0	0
Positions moved from Professional to Executive*	2	0	2	0	2	0	0	0	0	0	0	0	0
Promotion into Category	3	0	3	0	3	0	0	0	0	0	0	0	0
Data Adjustment (Sex Correction)*	0	0	0	0	0	0	0	0	0	0	0	0	0
Data Change (Job Classification Adjustment)	0	0	0	0	0	0	0	0	0	0	0	0	0
Data Correction	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL INCREASES	8	1	7	1	6	0	1	0	0	0	0	0	0
TERMINATION/NON-RENEWAL	0	0	0	0	0	0	0	0	0	0	0	0	0
FULL TIME TO PART TIME	0	0	0	0	0	0	0	0	0	0	0	0	0
PROMOTION OUT	0	0	0	0	0	0	0	0	0	0	0	0	0
RESIGNATIONS	0	0	0	0	0	0	0	0	0	0	0	0	0
RETIREMENTS	0	0	0	0	0	0	0	0	0	0	0	0	0
Employee moved to CT State	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL REDUCTIONS	0	0	0	0	0	0	0	0	0	0	0	0	0
PROMOS WITHIN	1	1	0	1	0	0	0	0	0	0	0	0	0

NOTES:
 * COSC conducted a review of their job titles and EEO classifications. Based on this review, folks previously identified as professional where moved into the executive category based on scope of duties and leadership qualifications.

Charter Oak State College
APPLICANT FLOW ANALYSIS - HIRES

OCCUPATIONAL CATEGORY: **Executive**
POSITION OR POSITION CLASSIFICATION: **All titles**
LOCATION: **Statewide/National**

DATE: **November 30, 2024**

APPLICANT FLOW ANALYSIS	GRAND TOTAL	TOTAL		WHITE		BLACK		HISPANIC		AAIANHNPI*		TWO or More		UNKNOWN			
		MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	UNKN	
Intra-agency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	A
Outside agency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	B
Reemployment List	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	C
Cert. Employment List	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	D
Transfer List	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	E
Other Applicants	51	14	34	5	19	3	8	3	3	2	0	0	0	1	4	3	F
TOTAL APPLICANTS	51	14	34	5	19	3	8	3	3	2	0	0	0	1	4	3	G
TOTAL REJECTED APPLICANTS	32	7	22	2	11	1	7	2	1	1	0	0	0	1	3	3	H
TOTAL QUALIFIED APPLICANTS	19	7	12	3	8	2	1	1	2	1	0	0	0	0	1	0	I
WITHDRAWAL	4	1	3	1	2	0	0	0	1	0	0	0	0	0	0	0	L
TOTAL INTERVIEWED	13	5	8	2	5	1	1	1	1	1	0	0	0	0	1	0	O
Not offered Position	10	4	6	1	4	1	0	1	1	1	0	0	0	0	1	0	P
Offered Position	3	1	2	1	1	0	1	0	0	0	0	0	0	0	0	0	Q
Refused Position	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	R
TOTAL ACCESSIONS*	3	1	2	1	1	0	1	0	0	0	0	0	0	0	0	0	S

Notes: Unknown applicant calculations are factored separately into the grand total, total male and total female categories. Total male + total female + unknown/unknown = grand total.

*AAIANHNPI = ASIAN, AMERICAN INDIAN, ALASKA NATIVE, HAWAIIAN NATIVE, PACIFIC ISLANDER

Charter Oak State College
APPLICANT FLOW ANALYSIS - PROMO

There were no promotions during the reporting period

OCCUPATIONAL CATEGORY: **Executive**

DATE: **November 30, 2024**

POSITION OR POSITION CLASSIFICATION: **All titles**

LOCATION: **Statewide/National**

APPLICANT FLOW ANALYSIS	GRAND TOTAL	TOTAL		WHITE		BLACK		HISPANIC		AAIANHNPI*		TWO or More		UNKNOWN			
		MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	UNKN	
Intra-agency	3	0	3	0	3	0	0	0	0	0	0	0	0	0	0	0	A
Outside agency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	B
Reemployment List	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	C
Cert. Employment List	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	D
Transfer List	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	E
Other Applicants	2	0	2	0	2	0	0	0	0	0	0	0	0	0	0	0	F
TOTAL APPLICANTS	5	0	5	0	5	0	0	0	0	0	0	0	0	0	0	0	G
TOTAL REJECTED APPLICANTS	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	H
WTIHDRAWAL	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L
TOTAL QUALIFIED APPLICANTS	4	0	4	0	4	0	0	0	0	0	0	0	0	0	0	0	I
TOTAL INTERVIEWED	4	0	4	0	4	0	0	0	0	0	0	0	0	0	0	0	O
Not offered Position	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	P
Offered Position	3	0	3	0	3	0	0	0	0	0	0	0	0	0	0	0	Q
Refused Position	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	R
TOTAL ACCESSIONS*	3	0	3	0	3	0	0	0	0	0	0	0	0	0	0	0	S

Notes: Unknown applicant calculations are factored separately into the grand total, total male and total female categories. Total male + total female + unknown/unknown = grand total.

*AAIANHNPI = ASIAN, AMERICAN INDIAN, ALASKA NATIVE, HAWAIIAN NATIVE, PACIFIC ISLANDER

Charter Oak State College
EMPLOYMENT PROCESS ANALYSIS

OCCUPATIONAL CATEGORY: Professional Non-Faculty
POSITION OR POSITION CLASSIFICATION: All Remaining Titles
LABOR MARKET AREA: Statewide/National

DATE: November 30, 2024

EMPLOYMENT PROCESS ANALYSIS	GRAND TOTAL	TOTAL		WHITE		BLACK		HISPANIC		AAIANHNPI*		TWO or MORE	
		MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Workforce Number Current Filing	40	14	26	10	20	2	2	1	3	1	0	0	1
Workforce Number Prior Filing	44	15	29	11	22	2	3	1	3	1	0	0	1
Net Change(+or-)	-4	-1	-3	-1	-2	0	-1	0	0	0	0	0	0
HIRES (incl. Pt to Ft)	8	2	6	1	3	1	2	0	1	0	0	0	0
RECLASS	0	0	0	0	0	0	0	0	0	0	0	0	0
TRANSFER IN	0	0	0	0	0	0	0	0	0	0	0	0	0
DATA Correction**	1	0	1	0	1	0	0	0	0	0	0	0	0
PROMO INTO CATEGORY	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL INCREASES	9	2	7	1	4	1	2	0	1	0	0	0	0
RESIGNATIONS	6	2	4	2	0	0	3	0	1	0	0	0	0
RETIREMENTS	1	0	1	0	1	0	0	0	0	0	0	0	0
JOB CATEGORY MOVED to EXECUTIVE	2	0	2	0	2	0	0	0	0	0	0	0	0
TERMINATION	1	1	0	0	0	1	0	0	0	0	0	0	0
TRANSFER OUT OF REGION	0	0	0	0	0	0	0	0	0	0	0	0	0
Promotion out	3	0	3	0	3	0	0	0	0	0	0	0	0
TRANSFER OUT	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL REDUCTIONS	13	3	10	2	6	1	3	0	1	0	0	0	0
PROMOS WITHIN	4	2	2	1	2	1	0	0	0	0	0	0	0

* COSC conducted a review of their job titles and EEO classifications. Based on this review, folks previously identified as professional where moved into the executive category based on scope of duties and leadership qualifications.

** Data correction for a hire that occurred in the previous plan year that was not reported accordingly.

Charter Oak State College
APPLICANT FLOW ANALYSIS - HIRES

OCCUPATIONAL CATEGORY: **Professional Non-Faculty**
 POSITION OR POSITION CLASSIFICATION: **All Remaining Titles**
 LOCATION: **Statewide/National**

DATE: **November 30, 2024**

APPLICANT FLOW ANALYSIS	GRAND TOTAL	TOTAL		WHITE		BLACK		HISPANIC		AAIANHNPI*		TWO or More		UNKNOWN			
		MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	UNKN	
Intra-agency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	A
Outside agency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	B
Reemployment List	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	C
Cert. Employment List	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	D
Transfer List	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	E
Other Applicants	645	119	479	56	242	22	105	16	44	6	22	4	21	15	45	47	F
TOTAL APPLICANTS	645	119	479	56	242	22	105	16	44	6	22	4	21	15	45	47	G
TOTAL REJECTED APPLICANTS	443	79	328	33	158	15	74	9	31	6	14	3	14	13	37	36	H
TOTAL QUALIFIED APPLICANTS	202	40	151	23	84	7	31	7	13	0	8	1	7	2	8	11	I
WITHDRAWAL	13	3	9	1	2	1	4	0	1	0	0	0	2	1	0	1	L
TOTAL INTERVIEWED	61	18	39	9	18	3	10	5	5	0	1	1	4	0	1	4	O
Not offered Position	51	16	31	8	13	2	8	5	4	0	1	1	4	0	1	4	P
Offered Position	9	2	7	1	4	1	2	0	1	0	0	0	0	0	0	0	Q
Refused Position	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	R
TOTAL ACCESSIONS*	8	2	6	1	3	1	2	0	1	0	0	0	0	0	0	0	S

Notes: Unknown applicant calculations are factored separately into the grand total, total male and total female categories. Total male + total female + unknown/unknown = grand total.

*AAIANHNPI = ASIAN, AMERICAN INDIAN, ALASKA NATIVE, HAWAIIAN NATIVE, PACIFIC ISLANDER

Charter Oak State College
APPLICANT FLOW ANALYSIS - PROMOTIONS - Non-examined

No promotions took place during the reporting period

OCCUPATIONAL CATEGORY: Professional Non-Faculty
POSITION OR POSITION CLASSIFICATION: All Remaining Titles
LOCATION: Statewide/National

DATE: November 30, 2024

APPLICANT FLOW ANALYSIS	GRAND TOTAL	TOTAL		WHITE		BLACK		HISPANIC		AAIANHNPI*		TWO or More		UNKNOWN			
		MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	UNKN	
Intra-agency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	A
Outside agency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	B
Reemployment List	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	C
Cert. Employment List	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	D
Transfer List	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	E
Other Applicants	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	F
TOTAL APPLICANTS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	G
TOTAL REJECTED APPLICANTS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	H
TOTAL QUALIFIED APPLICANTS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	I
WTIHDRAWAL	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L
TOTAL INTERVIEWED	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	O
Not offered Position	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	P
Offered Position	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Q
Refused Position	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	R
TOTAL ACCESSIONS*	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	S

Notes: Unknown applicant calculations are factored separately into the grand total, total male and total female categories. Total male + total female + unknown/unknown = grand total.

*AAIANHNPI = ASIAN, AMERICAN INDIAN, ALASKA NATIVE, HAWAIIAN NATIVE, PACIFIC ISLANDER

OCCUPATIONAL CATEGORY: EXECUTIVE/ADMINISTRATIVE/MANAGERIAL

All in Category

November 30, 2024

PERSONNEL EVALUATION ANALYSIS	TOTAL	TL MALE	TL FEM	WM	WF	BM	BF	HM	HF	OM	OF
SERVICE RATING											
Exceptional Performance	17	5	12	5	8				2		2
Exceeded Performance Reqs/Exceeds Expectations	1	1	0	1							
Met Performance Reqs/Meets Expectations	4	2	2	2	1		1				
Failed To Meet Perf Reqs/Doesn't Meet Expectations	0	0	0								
REPRIMANDS	0	0	0								
SUSPENSIONS	0	0	0								
DEMOTIONS											
Within Occ Category	0	0	0								
Lower Occ Category	0	0	0								
TRANSFERS											
Intra-agency	0	0	0								
Outside Agency	0	0	0								

OCCUPATIONAL CATEGORY: PROFESSIONAL NON-FACULTY

All in Category

November 30, 2024

PERSONNEL EVALUATION ANALYSIS	TOTAL	TL MALE	TL FEM	WM	WF	BM	BF	HM	HF	OM	OF
SERVICE RATING											
Excellent	24	7	17	6	14		2	1	1		
Good	17	6	11	4	8	2	1		2		
Satisfactory	5	0	5		4		1				
Fair	0	0	0								
Unsatisfactory	0	0	0								
REPRIMANDS	0	0	0								
SUSPENSIONS	0	0	0								
DEMOTIONS											
Within Occ Category	0	0	0								
Lower Occ Category	0	0	0								
TRANSFERS											
Intra-agency	0	0	0								
Outside Agency	0	0	0								

Section 46a-68-87
Identification of Problem Areas

Section 46a-68-87: IDENTIFICATION OF PROBLEM AREAS

Each of the following items were examined by the Equal Employment Opportunity Specialist in conjunction with Human Resource to identify any non-quantifiable aspects of the employment process which may impede or prevent the full and fair participation of protected race/sex group members in the employment process:

Employment Applications: Charter Oak State College (COSC) utilizes an Applicant Tracking System (ATS) application as the online recruitment tool for unclassified positions. The ATS allows applicants to submit all necessary application materials and allows for the search process to be well documented. Applicants are asked to submit a cover letter, resume and application to be considered for a position. The ATS was used throughout the plan period and the functionality of the software allows COSC to capture the demographic information as candidates apply. There is no barrier identified.

Job Qualifications: COSC uses the minimum qualifications and at times preferred qualifications for unclassified positions as defined by the Connecticut State Colleges and Universities (CSCU) System. Neither set of qualifications is known to impede or prevent the full and fair participation of protected race/sex group members in the employment process. The Job Qualifications do not demonstrate any barrier to the full and fair participation of protected race/sex group members in the employment process.

Job Specifications: COSC develops job specifications prior to its recruitment activity for unclassified positions. The hiring manager meets with Human Resources to review job specifications and determine the essential functions of the position to ensure they are job related. The Job Specifications do not demonstrate any barrier to the full and fair participation of protected race/sex group members in the employment process.

Recruitment Practices: COSC follows the guidelines for recruitment practices established by the Connecticut State Colleges and Universities (CSCU) System. The COSC continually builds relationships with local organizations and with other recruitment sources locally and nationally. Additionally, recruitment efforts in place at the CSCU continually identifies viable recruitment sources for all unclassified positions. As a result of these efforts, nearly all recruitments have diverse and goal candidates within their pools.

The EEO Team in partnership with Human Resources is tasked with the responsibility of giving the affirmative action search charge to each search committee to provide training to ensure there are no unfair hiring practices or any inherent biases during any part of the employment process.

The entire search process is monitored: from the development of job specifications, development of a diverse recruitment plan, creating legal interview questions, having a fair and consistent process to evaluate the applicant pool, a complete and thorough review of search documentation by search committee members and conducting interviews fairly for all qualified applicants.

Additionally, to minimize the impacts of bias in the search process, all search committee members are required to complete Bias in the Interview Training.

COSC also has a continuous quality improvement approach to the search process to identify potential barriers in the process.

There are no barriers identified that impede or prevent the full and fair participation of protected race/sex group members in the employment process.

Personnel Policies: COSC utilizes policies published by the Connecticut State Colleges and Universities (CSCU) for unclassified positions.

All CSCU personnel policies are established system wide and utilized within COSC. These policies are

continually reviewed to ensure compliance with relevant laws and regulations.

The CSCU policies do not impede or prevent the full and fair participation of protected race/sex group members in the employment process.

Job Structuring: There is no identified barrier related to the COSC's job structuring that would impede or prevent the full and fair participation of protected race/sex group members in the employment process.

Orientation: New employees receive orientation on their first day of hire through CSCU and then by Charter Oak State College in their department where they are assigned. The new employees and faculty members receive information on the AA/EEO policies, discrimination complaint process, sexual harassment prevention, Diversity Training, benefits and collective bargaining information. They also receive information on the State Ethics Policy and other State and CSCU Policies.

There is no known barrier identified that would impede or prevent the full and fair participation of protected race/sex group members in the employment process.

Training: Employees are free to apply for training opportunities as covered by their respective collective bargaining agreements. Managers are encouraged to take advantage of training and professional development opportunities. Charter Oak State College offers opportunities for training and in-service professional development opportunities to meet identified needs.

Charter Oak State College will continue to closely monitor employee participation to ensure that they receive mandatory Diversity and Sexual Harassment training. In addition, Sexual Harassment Prevention Training is assigned to employees online.

New hires to Charter Oak State College are registered in the training portal for mandated training upon their hire. Assigning the courses upon hire ensures that the employees are able to complete the required trainings during their first month of hire to ensure compliance with the training.

Counseling: Employment counseling is available to all employees upon request. More information will be included in the Career Mobility Section of the Affirmative Action Plan.

The Employee Assistance Program (EAP) is also available to all employees and to members of their family for counseling and professional support in dealing with personal, emotional, family or health problems. EAP assists with complex issues such as drug and alcohol dependency, single parenting, marital crisis, stress, financial uncertainty or emotional distress.

There is no known barrier that would impede or prevent the full and fair participation of protected race/sex group members in the employment process.

Discrimination Complaint Process: The Discrimination Complaint Process is in place at Charter Oak State College and across the entire CSCU system. Charter Oak State College follows the Connecticut State Colleges and Universities Discrimination Complaint Policy and Procedures. The procedure is distributed to all employees, posted on bulletin boards and is also posted on the CSCU website. This process allows any employee to file complaints and provides protection against retaliation.

There is no known barrier identified that would impede or prevent the full and fair participation of protected race/sex group members in the employment process.

Evaluation: Charter Oak State College and their leadership follow the respective collective bargaining agreements and guidelines established by the CSCU system office for unclassified personnel evaluations.

There is no known barrier that would impede or prevent the full and fair participation of protected race/sex group members in the employment process.

Layoffs: Layoffs occur in accordance with policy and procedures. There were no layoffs during the reporting period.

There is no known barrier identified that would impede or prevent the full and fair participation of protected race/sex group members in the employment process.

Termination: In the event of termination of employment, the COSC adheres to language in the respective collective bargaining agreements and applicable State statutes.

There is no known barrier identified that would impede or prevent the full and fair participation of protected race/sex group members in the employment process.

Charter Oak State College's leadership, EEO Team, and assigned Human Resource professionals have examined all aspects of the employment process itemized in subsection (a) of this section and have not identified any employment policy or practice that would impede or prevent the full and fair participation of individuals with disabilities and older persons in the workforce.

Section 46a-68-88

Program Goals

Section 46a-68-88 – PROGRAM GOALS

Subsection (a)

The Affirmative Action Regulations require that the Charter Oak State College examine all aspects of the employment process described in the Identification of Problem Areas element and set programmatic goals when any employment policy or practice may impede or prevent the full and fair participation of protected race and sex group members, individuals with disabilities or older persons.

No employment processes were identified as having an adverse impact on any protected race/sex group. Nevertheless, the College continues to be aggressive in its attempts to fulfill its affirmative action and equal employment opportunity commitments.

Subsection (b)

Program goals shall be meaningful, measurable and reasonably attainable and shall be consistent with Section 46a-68-92 Good Faith Efforts of the Affirmative Action Regulations to ensure:

1. The promotion of Equal Employment 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 non-discriminatory recruitment and selection process; and
4. That career development opportunities are available to all interested and qualified employees, including minorities and women.

Subsection (c)

Where the cooperation of another agency, CT State Community College, or University is essential to the implementation of a program goal, Charter Oak State College shall keep a record of each instance of contact with the respective organization whose cooperation is requested and the outcome of the request.

Subsection (d)

Charter Oak State College may elect to set program goals or the Commission on Human Rights and Opportunities (CHRO) 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 Affirmative Action Regulations of Connecticut State Agencies.

2024 – 2026 PROGRAM GOALS

While the Charter Oak State College has not identified any barriers in any of the employment processes within the Identification of Problem Areas element, the College sets the goals below to enhance its efforts to ensure affirmative action and equal employment opportunity compliance.

1. To increase collaboration within the Charter Oak workforce, the college will explore a college wide retreat. The retreat will promote cohesiveness, inclusivity for in person and remote workers which will result in increased morale and retention.

Responsible persons: Human Resources

Timeframe: Completion by June 30, 2026.

2. The College will continue to encourage its employees to avail themselves of the training opportunities offered by the CSCU system office, both for compliance and professional development.

Responsible persons: Charter Oak State College Leadership

Timeframe: June 30, 2026

Section 46a-68-89
Discrimination Complaint
Process

Section 46a-68-89 DISCRIMINATION COMPLAINT PROCESS

The Charter Oak State College (COSC) encourages all employees to utilize the internal grievance procedure adopted by the Board of Regents and the CSCU in all cases of alleged discrimination in employment based on any of the following factors: age, alienage, ancestry, color, national origin, gender identity or expression, genetic information, learning disability, marital status, intellectual disability, physical disability (including but not limited to blindness), present or past history of mental disability, prior criminal record, race, religious creed, sex (including pregnancy and sexual harassment), sexual orientation, status as a victim of domestic violence, retaliation for previously opposed discrimination or coercion, veteran status, members of the CT Civil Air Patrol, and workplace hazards to reproductive systems.

During the Affirmative Action Plan year, the BOR issued an Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy and related procedures. An email providing notice of the policy and procedures was sent out to employees systemwide. The interim policy:

- 1) Revises CSCU's policies and procedures related to Title IX to comply with the new regulations.
- 2) Closes gaps in the policies related to nondiscrimination and harassment for all protected characteristics and activities.
- 3) Makes critical updates that clarify and streamline the sexual misconduct, nondiscrimination, and harassment policies and procedures into one comprehensive policy that governs all members of CSCU's workplace and campus communities under the same rules.

The procedure adheres to all regulatory expectations noted below:

- 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 the Connecticut General Statutes;
 - 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.
- b) All records of internal discrimination complaints and dispositions thereof are 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.

- c) A summary of the matters alleged, the results thereof and the length of time required to resolve the grievance/complaint is included within this AA Plan. The plan shall provide information on the number of such complaints, the 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.

Two complaints were filed during this reporting period. One complaint was unsubstantiated and the other case is still pending. The number of complaints does not suggest that there is a trend of disparate treatment across the institution.



**CONNECTICUT STATE COLLEGES AND UNIVERSITIES
INTERIM RESOLUTION PROCESS PROCEDURES
FOR THE DISCRIMINATORY HARASSMENT,
NONDISCRIMINATION, AND TITLE IX POLICY**

Section 1: General Information

- Application of Policies
- Definitions of Key Terms
- Title IX/Equity Coordinators and Deputy Title IX/Equity Coordinators
- Rights of Parties
- False Accusations
- Amnesty
- Preservation of Evidence
- Communication Generally

Section 2: Reporting

- Making a Report or Complaint
- Mandated Reporting and Confidential Employees
- Confidentiality and Privacy in the Resolution Process
- Unauthorized Disclosure of Information
- Time Limits/Timelines for Reporting

Section 3: Screening and Initial Evaluation

- Initial Evaluation of Report/Complaint
- Supportive Measures for Parties
- Title IX/Equity Coordinator Authority to Initiate a Complaint
- Emergency Removal/Interim Suspension of a Student
- Placing an Employee on Leave
- Dismissal of a Complaint
- Appeal of a Dismissal
- Federal Timely Warning Obligations
- Counter-Complaints
- Advisors

Section 4: Informal Resolution

Section 5: Resolution Process

- Resolution Timeline
- Ensuring Impartiality
- Resolution Process Pool
- Notice of Investigation and Allegations
- Investigation

- Draft Investigation Report
- Decision-Making Phase
- Final Questioning Meetings
- Final Investigation Report and Policy Determination
- Final Decision-maker's Determination of Sanctions (when applicable)
- Sanctions
- Notice of Outcome
- Appeals

Section 6: Other Considerations Related to the Resolution Process

- Long-Term Remedies/Other Actions
- Failure to Comply with Sanctions, Responsive Actions, and/or Informal Resolutions
- Recordkeeping
- Disability Accommodations During the Resolution Process
- Other Support During the Resolution Process

Section 7: Procedures to Provide Modifications for Pregnancy and Related Conditions and Parenting Students

- Information Sharing Requirements
- Reasonable Modifications for Students
- Certification to Participate
- Lactation Space Access

Section 8: Revision of these Procedures

Appendix A: Title IX Grievance Procedures for Addressing Formal Complaints of Sexual Harassment for Incidents of Covered Sexual Harassment That Are Alleged to Have Occurred Prior to August 1, 2024 (adapted from procedures last updated on September 17, 2021)

Section 1: General Information

The Connecticut State Colleges and Universities (CSCU) will act on any Report or Complaint of a potential violation of the Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy ("the Policy") that is received by a Title IX/Equity Coordinator (or their designees) or any other Mandated Reporter by applying the Resolution Process below. These procedures apply to all allegations of discrimination on the basis of an actual or perceived protected characteristic, harassment, retaliation involving students, staff, administrators, faculty members, or third parties. Unionized/other categorized employees are subject to the terms of their agreements/employees' rights to the extent those agreements do not conflict with federal or state compliance obligations.

CSCU will take actions to promptly and effectively end any discrimination, harassment, and/or retaliation, and will treat Parties equitably. CSCU will take reasonable steps to protect the privacy of the Parties and any witnesses, provided that it does not restrict the ability of the Parties to obtain and present evidence, including by speaking to witnesses without engaging in retaliation or consult with family members, confidential persons, or Advisors, or otherwise prepare for or participate in these Procedures.

Application of Policies

These Procedures apply to the following CSCU Board of Regents Policies:

- Affirmative Action and Equal Employment Opportunity Policy Statement ([Policy 4.5](#))
- Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy ([Policy 4.13](#))

Definitions of Key Terms

- **Advisor.** Any person chosen by a Party who may accompany the party to all meetings related to these Procedures and advise the Party on the process.
- **Appeal Decision-maker.** The person or panel who accepts or rejects a submitted appeal request, determines whether any of the grounds for appeal are met, and directs responsive action(s), accordingly.
- **College or University.** Any of the institutions within CSCU, including Central Connecticut State University, Charter Oak State College, Connecticut State Community College, Eastern Connecticut State University, Southern Connecticut State University, and Western Connecticut State University.
- **Complainant.** A student or employee who is alleged to have been subjected to conduct that could constitute discrimination, harassment, and/or retaliation under the Policy; or a person other than a student or employee who is alleged to have been subjected to conduct that could constitute discrimination, harassment, and/or retaliation under the Policy and who was participating or attempting to participate in CSCU's education program or activity at the time of the alleged discrimination, harassment and/or retaliation.
- **Complaint.** An oral or written request to CSCU that can objectively be understood as a request for CSCU to investigate and make a determination about allegations of discrimination, harassment, and/or retaliation under the Policy.
- **CSCU.** The Connecticut State Colleges and Universities, which includes the CSCU system office, and any and all specific Colleges or Universities within the CSCU. For purposes of the Policy, the term "CSCU" could mean the CSCU system or any College or University interchangeably.
- **Day.** A business day when CSCU is in normal operation. All references in these Procedures to days refer to business days unless specifically noted as calendar days.
- **Final Decision-maker.** The person who participates in Final Questioning Meetings and determines what sanctions should be applied (where applicable).
- **Education Programs and Activities.** Locations, events, or circumstances in which CSCU exercises substantial control over both the Respondent and the context in which the conduct occurred.
- **Employee.** A person employed by CSCU either full- or part-time, including student employees when acting within the scope of their employment.
- **Familial Status.** The configuration of one's family or one's role in a family.
- **Final Determination.** A conclusion by the standard of proof that the alleged conduct did or did not violate the Policy.

- **Finding.** A conclusion by the standard of proof that the conduct did or did not occur as alleged (as in a “finding of fact”).
- **Informal Resolution.** A resolution to a Report or Complaint agreed to by the Parties and CSCU that occurs prior to a final determination in the Resolution Process.
- **Investigation Report.** The Investigator’s summary of all relevant evidence gathered during the investigation. Variations include the Draft Investigation Report and the Final Investigation Report.
- **Investigator(s).** The person(s) authorized by CSCU to gather facts about an alleged violation of the Policy, assess relevance and credibility, synthesize the evidence, and compile this information into an Investigation Report. The Investigator(s) determines Findings and makes the Final Determination.
- **Marital Status.** The state of being married or unmarried.
- **Parental Status.** The status of a person who, with respect to another person who is under the age of 18,¹ is a biological, adoptive, foster, or stepparent; a legal custodian or guardian; in loco parentis with respect to such a person; or actively seeking legal custody, guardianship, visitation, or adoption of such a person.
- **Parties.** The Complainant(s) and Respondent(s), collectively.
- **Pregnancy or Related Conditions.** Pregnancy, childbirth, termination of pregnancy, or lactation, medical conditions related thereto, or recovery therefrom.
- **Protected Characteristic.** Any characteristic for which a person is afforded protection against discrimination and/or harassment by law or CSCU Policy.
- **Reasonable Modifications.** Individualized modifications to CSCU’s policies, practices, or procedures that do not fundamentally alter CSCU’s education program or activity.
- **Relevant Evidence.** Evidence that may aid in determining whether the alleged discrimination, harassment, and/or retaliation occurred, or in determining the credibility of the Parties or witnesses.
- **Remedies.** Typically, post-resolution actions directed to the Complainant and/or the community as mechanisms to address safety, prevent recurrence, and restore or preserve equal access to CSCU’s education program and activity.
- **Report.** When a faculty, staff, student, or third party informs CSCU of conduct that reasonably may constitute discrimination, harassment, and/or retaliation under the Policy.
- **Resolution Process.** The investigation and resolution, including informal resolution, of allegations of discrimination, harassment, and/or retaliation under the Policy.
- **Respondent.** A person who is alleged to have engaged in conduct that could constitute discrimination based on a protected characteristic, harassment, or retaliation for engaging in a protected activity under the Policy.
- **Sanction.** A consequence imposed on a Respondent who is found to have violated the Policy.

¹ Or a person who is 18 or older but who is incapable of self-care because of a mental or physical disability.

- **Sex.** Sex assigned at birth, sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity.
- **Supportive Measures.** Non-disciplinary, non-punitive individualized services offered as appropriate and reasonably available. They are offered, without fee or charge to the Parties, to restore or preserve access to CSCU's education program or activity, including measures designed to protect the safety of all Parties and/or the CSCU educational environment and/or to deter discrimination, harassment, and/or retaliation.
- **Title IX/Equity Coordinator.** At least one official designated by a College or University to ensure compliance with Title IX and other federal and state civil rights laws and institutional compliance with the Policy. References to the Title IX/Equity Coordinator throughout these Procedures may include the Title IX/Equity Coordinator's designee.

Title IX/Equity Coordinators and Deputy Title IX/Equity Coordinators

CSCU has identified the Executive Director of EEO and Civil Rights/Title IX Coordinator to support the System's compliance with federal, state, and other civil rights laws and policies. Each College or University has identified a Title IX/Equity Coordinator to coordinate civil rights compliance and the Resolution Process.² The Vice-President of Diversity, Equity and Inclusion serves as the Title IX/Equity Coordinator for Connecticut State Community College ("CSCC"). Each CSCC campus has a Deputy Title IX/Equity Coordinator to support civil rights compliance and programming for their institution.

System Office:

Kim Pacelli, Interim Title IX Coordinator (Executive Director of EEO and Civil Rights/Title IX Coordinator)
 (610) 993-0229 x1018
 61 Woodland Street, Hartford, CT 06105
 kim.pacelli@tngconsulting.com
<https://www.ct.edu/hr/nondiscrimination>

Central Connecticut State University:

Jill Bassett Cameron, Senior Equity & Title IX Coordinator (Title IX/Equity Coordinator)
 (860) 832-1653
 Davidson Hall, Room 1993
 jbassett-cameron@ccsu.edu
<https://www.ccsu.edu/OEI>

Charter Oak State College:

David Ferreira, Provost (Title IX/Equity Coordinator)
 (860) 515-3727
 185 Main Street, New Britain, CT 06051
 dferreira@charteroak.edu
<https://www.charteroak.edu/student-conduct-title-ix/>

² Note that individuals who serve as Title IX/Equity Coordinator for the institutions may have additional job titles and functions, as well. Although other staff from a College/University may support the Policy and these Procedures, all faculty and staff are always encouraged to coordinate efforts with their College/University Title IX/Equity Coordinator.

Eastern Connecticut State University:

Sara Madera, Director of Institutional Equity/Title IX Coordinator (Title IX/Equity Coordinator)
(860) 465-5012
Gelsi-Young, Room 253
maderas@easternct.edu
<https://www.easternct.edu/equity-and-diversity/titleix.html>

Southern Connecticut State University:

Paula Rice, Director of Diversity & Equity Programs/Title IX Coordinator (Title IX/Equity Coordinator)
(203) 392-5568
501 Crescent Street, Engleman B110G, New Haven, CT 06515
ricep1@southernct.edu
<https://inside.southernct.edu/diversity>

Western Connecticut State University:

Scott Towers, Interim Title IX Coordinator/Price Center Coordinator (Title IX/Equity Coordinator)
(203) 837-8444
181 White Street, Danbury, CT 06810
towerss@wcsu.edu
<https://www.wcsu.edu/diversity/what-is-title-ix-and-cart/>

Connecticut State Community College ("CT State"):

John-Paul Chaisson-Cardenas, Vice President of Diversity, Equity, and Inclusion, Title IX Coordinator, and Chief Diversity Officer (Title IX/Equity Coordinator)
(860) 612-7056
185 Main Street, New Britain, CT 06051
jchaisson-cardenas@commnet.edu
<https://ctstate.edu/life-at-ct-state/dei>

Office of Equity and Civil Rights (ECR)
Connecticut State Community College
185 Main Street, New Britain, CT 06051
Nicholas D'Agostino, Director of Equity and Civil Rights
(860) 723-0727
NDagostino@commnet.edu
<https://ctstate.edu/life-at-ct-state/dei/ecr>

CT State Deputy Title IX/Equity Coordinators:

<https://ctstate.edu/life-at-ct-state/dei/odei-staff>

Asnuntuck: Dawn Bryden, Room 101, dbryden@asnuntuck.edu, (860) 253-1277

Capital: Jason Scappaticci, Room 210, jscappaticci@ccc.commnet.edu, (860) 906-5086

Gateway: Alese Mulvihill, Room N-220, amulvihill@gwcc.commnet.edu, (203) 285-2210

Housatonic: Yannick Brookes, Lafayette Hall Room 118, YBrookes@housatonic.edu or HC-TitleIX@housatonic.edu, (203) 332-5108

Manchester: Trent "T.J." Barber, Lowe 287, tbarber@manchestercc.edu, (860) 512-3203

Middlesex: Sara Hanson, Founders Hall, Room 107, SHanson@mxcc.edu, (860) 343-5883

Naugatuck Valley: Sarah Gager, Kinney Hall, Room 509, sgager@nv.edu, (203) 575-8086

Northwestern: Ruth Gonzalez, Goulet Building, 56 Park Place, rgonzalez@nwcc.edu, (860) 783-6315

Norwalk: Tony Pepper, Room W106, gpeffer@norwalk.edu, (203) 857-7309

Quinebaug Valley: Tanaya Walters, Office E233, twalters@gvcc.edu, (860) 932-4184

Tunxis: Sydney Lake, Office 1-116, slake@tunxis.edu, (860) 773-1644

Rights of Parties

Parties have the following rights under these procedures:

- The opportunity to request that a Resolution Process, including an investigation, begin promptly.
- An equitable investigation and resolution of all credible allegations of prohibited discrimination, harassment, and/or retaliation when reported in good faith to CSCU officials.
- Timely written notice of all alleged violations, including the identity of the Parties involved (if known), the specific misconduct being alleged, the date and location of the alleged misconduct (if known), the implicated Policies and procedures, and possible sanctions.
- The right to have individuals leading the Resolution Process who have been trained annually in the area relevant to the complaint (i.e., discrimination, harassment, and/or retaliation).
- The right to have an Advisor or support person of their choosing (e.g., union representative) accompany them to any meetings, interviews, or proceedings throughout the process, as long as the involvement of the Advisor or support person does not unduly delay, postpone, or disrupt the proceedings.
- The right to present evidence and witnesses on their behalf.
- The right to receive written notice of the results of the investigation or outcome within a reasonable timeframe.
- The right to request an appeal or review of the outcome.
- Be informed of options to notify proper law enforcement authorities, including on-campus and local police, and the option(s) to be assisted by the CSCU in notifying such authorities, if the Party chooses. This also includes the right to not be pressured to report.
- Have all personally identifiable information protected from the CSCU's release to the public without consent, except to the extent permitted by law.

False Accusations

Deliberately false and/or malicious accusations are a serious offense and could be subject to appropriate disciplinary action. This does not include allegations that are made in good faith but are ultimately shown to be erroneous or do not result in a determination of a Policy violation. Additionally, witnesses and Parties who knowingly provide false evidence, tamper with or destroy evidence, or deliberately mislead an official conducting an investigation or resolution process can be subject to discipline under appropriate CSCU or College/University policies.

Amnesty

CSCU encourages the reporting of misconduct and crimes. Sometimes, Complainants or witnesses are hesitant to make a Report or Complaint to CSCU officials or participate in the Resolution Process because they fear that they themselves may be in violation of CSCU policies, such as underage drinking or use of illicit drugs at the time of the incident. Respondents may hesitate to be forthcoming during the process for the same reasons. It is in the best interests of the CSCU community that Complainants report misconduct to CSCU officials, that witnesses come forward to share what they know, and that all Parties be forthcoming during the process. To encourage reporting and participation in the process, CSCU

maintains a practice of offering students amnesty from minor policy violations, such as illegal alcohol consumption or the use of illicit drugs, related to the incident. Granting amnesty is a discretionary decision made by the CSCU, and amnesty does not apply to more serious allegations, such as physical abuse of another or illicit drug distribution.

Preservation of Evidence

The preservation of evidence may be critical to potential criminal prosecution and to obtaining restraining/protective orders, and it is particularly time sensitive. CSCU will inform the Complainant of the importance of preserving evidence by taking actions such as the following:

Sexual Assault

- Seek forensic medical assistance at the nearest hospital, ideally within 120 hours of the incident (sooner is better).
- Avoid urinating, showering, bathing, washing hands or face, or douching, if possible, but evidence may still be collected even if you do.
- If oral sexual contact took place, refrain from smoking, eating, drinking, or brushing teeth.
- If clothes are changed, place soiled clothes in a paper bag (plastic destroys evidence) or a secure evidence container (if provided one by law enforcement)
- Seeking medical treatment can be essential, even if it is not for the purposes of collecting forensic evidence.

Stalking/Dating Violence/Domestic Violence/Sex-Based Harassment

- Evidence in the form of text and voice messages may be lost in most cases if a Party changes their phone number.
 - Make a secondary recording of any voice messages and/or save the audio files to a cloud server.
 - Take screenshots and/or a video recording of any text messages or other electronic messages (e.g., Instagram, Snapchat, Facebook).
- Save copies of email and social media correspondence, including notifications related to account access alerts.
- Take timestamped photographs of any physical evidence, including notes, gifts, etc., in their original place when possible.
- Save copies of any messages, including those showing any request for no further contact.
- Obtain copies of call logs showing the specific phone number being used rather than a saved contact name if possible.

During the initial meeting between the Complainant and a Title IX/Equity Coordinator, the importance of taking these actions will be discussed, if timely.

Communication Generally

Per CSCU's [Information Technology Electronic Communication Policy](#) (BOR Policy 5.3.b), all written communication from CSCU officials regarding the Resolution Process will be delivered to the CSCU/College/University e-mail accounts of students and employees. If a person involved in the Resolution Process is not a student or employee, reasonable means will be used to contact them.

Section 2: Reporting

Making a Report or Complaint

A Report provides notice to CSCU of an allegation or concern about discrimination, harassment, and/or retaliation and provides an opportunity for the Title IX/Equity Coordinator to provide information, resources, and supportive measures. A Complaint provides notice to CSCU that the Complainant would like to initiate an investigation or other appropriate resolution procedures. An individual may initially make a Report and may decide at a later time to make a Complaint.

Reports or Complaints of discrimination, harassment, and/or retaliation may be directed to the Title IX/Equity Coordinator for the College/University (see above). Reports or Complaints can be made directly to the Title IX/Equity Coordinator at any time (including during non-business hours) by mail, phone, e-mail, or in person. Additionally, a College/University may choose to maintain secure, on-line forms to receive Reports; those online forms may be found at the College/University websites listed above.

Reporting carries no obligation to initiate a Complaint, and in most situations, CSCU may be able to respect a Complainant's request to not initiate the Resolution Process. However, there may be circumstances, such as pattern behavior, allegations of severe misconduct, or a compelling threat to health and/or safety, where CSCU may need to initiate the Resolution Process.

Anonymous reports are accepted, but anonymous reports may give rise to a need to try to determine the Parties' identities. Anonymous reports typically limit the CSCU's ability to investigate, respond, and provide remedies, depending upon what information is shared. Measures intended to protect the community or address or mitigate harm may be pursued. If an individual initially makes an anonymous report and later chooses to identify themselves by making a Report or Complaint, they may do so by contacting the Title IX/Equity Coordinator or the Deputy Title/Equity Coordinator (or for CT State, any official in the Office of Equity and Civil Rights).

Filing a report through these procedures has no bearing on other reporting procedures. Complainants may concurrently file reports with law enforcement, other state agencies (listed in the [Policy](#)), and any other entity as appropriate to their circumstances. Complainants will also never be required to file a report with another agency in order to make a Report to CSCU.

Mandated Reporting and Confidential Employees

All CSCU employees (including student-employees), other than those deemed Confidential Employees below, are Mandated Reporters and are expected to promptly report all known details of actual or suspected discrimination, harassment, and/or retaliation to the Title IX/Equity Coordinator immediately.

Complainants and other individuals should consider whether they share personally identifiable details with Mandated Reporters, as those details must be shared with the Title IX/Equity Coordinator. A Complainant who desires formal action in response to their allegations may report to any Mandated Reporter, who can connect them with resources to report alleged crimes and/or Policy violations, and Mandated Reporters will immediately notify the Title IX/Equity Coordinator (and/or police, if desired by the individual or required by law), who will act when an incident is reported to them.

CSCU makes every effort to preserve the Parties' privacy. Information related to a Report or Complaint will be shared with a limited number of CSCU employees who "need to know" in order to assist in providing supportive measures or evaluating, investigating, or resolving a Report or Complaint. All

employees who are involved in the CSCU's procedures under the Policy receive specific training and guidance about sharing and safeguarding private information in accordance with federal and state law. CSCU will not share the identity of any individual who has made a Report or Complaint; any Complainant; any individual who has been reported to be the perpetrator of discrimination, harassment, and/or retaliation; any Respondent; or any witness, except as permitted by, or to fulfill the purposes, of applicable laws and regulations (e.g., Title IX), Family Educational Rights and Privacy Act (FERPA) and its implementing regulations, or as required by law; including any investigation, or resolution proceeding arising under the Policy.

Confidential Employees.³ To enable individuals to access support and resources without filing a Complaint, CSCU has designated specific employees as Confidential Employees. Those designated by CSCU as Confidential Employees for purposes of the Policy are not required to report actual or suspected discrimination, harassment, and/or retaliation in a way that identifies the reporting individual. They will, however, provide individuals with the Title IX/Equity Coordinator's contact information and offer options and resources without any obligation to inform an outside agency or the Title IX/Equity Coordinator unless an individual has requested the information be shared.

There are three categories of Confidential Employees: 1) Those with confidentiality bestowed by law or professional ethics, such as lawyers, medical professionals, clergy, and counselors; 2) Those whom CSCU has specifically designated as confidential for purposes of providing support and resources to the individual; and 3) Those conducting human subjects research as part of a study approved by an Institutional Review Board (IRB). For those in category 1), above, to be able to respect confidentiality, they must be in a confidential relationship with reporting individual, such that they are within the scope of their licensure, professional ethics, or confidential role at the time of receiving the report. These individuals will maintain confidentiality except in extreme cases of health or safety emergencies, immediacy of threat or danger or abuse of a minor, elder, or individual with a disability, or when required to disclose by law or court order.⁴

If a Complainant would like the details of an incident to be kept confidential, they may speak with the following Confidential Employees:

- Campus-based counseling center staff
- Campus-based health center staff
- Any clergy affiliated with a College or University
- Ombudspersons
- On-campus victim advocates
- Sports medicine staff/Athletic trainers

In addition, a Complainant may speak with individuals unaffiliated with CSCU without concern that the Policy will require them to disclose information to the CSCU without permission such as: licensed professional counselors and other medical providers, local rape crisis counselors, domestic violence resources, local or state assistance agencies, clergy/chaplains, attorneys.

³ The term "confidential" as used in these Procedures differs from the use of the term "management/confidential" typically used to describe a category of employees within CSCU.

⁴ All employees must always comply with CSCU BOR [Policy 5.6](#), Reporting Suspected Abuse or Neglect of a Child, as applicable.

Confidentiality and Privacy in the Resolution Process

CSCU makes every effort to preserve the Parties' privacy, consistent with applicable federal and state laws; however, full confidentiality cannot be guaranteed throughout the Resolution Process. Only necessary and relevant information will be shared with witnesses and other involved individuals. CSCU officials may share information related to complaints with other campus officials at any point during or after the proceedings as necessary to fulfill institutional obligations. Additionally, CSCU officials may share relevant information with internal or external entities, consistent with applicable laws, if necessary to protect the campus community.

Unauthorized Disclosure of Information

Parties and Advisors are prohibited from unauthorized disclosure of information obtained by CSCU through the Resolution Process, to the extent that information is the work product of the CSCU (meaning it has been produced, compiled, or written by CSCU for purposes of its investigation and resolution of a Report or Complaint). It is also a violation of CSCU Policy to publicly disclose work product or a party's personally identifiable information without authorization or consent. Violation of this Policy is subject to disciplinary action.

Time Limits/Timelines for Reporting

There is no time limitation on providing Reports or Complaints to a Title IX/Equity Coordinator. However, if an individual is no longer subject to the CSCU's jurisdiction and/or significant time has passed, the ability to investigate, respond, and/or provide remedies may be more limited or impossible. Acting on Reports or Complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of the Policy) is at CSCU's discretion; they may document allegations for future reference, offer supportive measures and/or remedies, and/or engage in informal or formal action, as appropriate.⁵

Section 3: Screening and Initial Evaluation

Initial Evaluation of Report/Complaint

Once a Report or Complaint of discrimination, harassment, or retaliation is received by a Title IX/Equity Coordinator, an initial evaluation will be conducted within five (5) days of receipt. The Title IX/Equity Coordinator of the College/University conducts the initial evaluation and may consult as appropriate with other College/University officials. In the case of CT State, an ECR official conducts the initial evaluation, and may consult with appropriate other CT State/campus officials, including the campus's Deputy Title IX/Civil Rights Coordinator. In order to conduct this initial evaluation, the Complainant may be contacted to gather further information as necessary.

The initial evaluation typically includes:

- Assessing whether the reported conduct may reasonably constitute a violation of the Discriminatory Harassment, Nondiscrimination, and Title IX Policy.

⁵ Complainants should note that some federal and state agencies, such as the Connecticut Commission on Human Rights and Opportunities (CHRO) and the U.S. Equal Employment Opportunity Commission (EEOC), have a three hundred (300) day time limit for filing a claim of discrimination and the U.S. Department of Education Office of Civil Rights (OCR) has a 180 day time-limit.

- If the conduct may not reasonably constitute a violation of the Policy, a Complaint is typically dismissed from these procedures, consistent with the dismissal provision below, and the Report/Complaint may then be referred to another appropriate College/University office, if applicable.
- Determining whether CSCU has jurisdiction over the reported conduct, as defined in Applicability and Jurisdiction section of the Policy.
 - If the conduct is not within CSCU jurisdiction, a Complaint is typically dismissed from these procedures, consistent with the dismissal provision below, and the Report/Complaint may then be referred to another appropriate College/University office, if applicable.
- Offering and coordinating supportive measures for the Complainant.
- Offering and coordinating supportive measures for the Respondent, as applicable.
- Notifying the Complainant, or the person who reported the allegation(s), of the resolution options, including a supportive and remedial response, any Informal Resolution options (if appropriate), or the Resolution Process described below.
- Determining whether the Complainant wishes to make a Complaint, if they have not done so already.
- If a Complaint is made, notifying the Respondent of the resolution options, including a supportive and remedial response, any Informal Resolution options (if appropriate), or the Resolution Process described below.

Supportive Measures for Parties

CSCU will offer and implement appropriate and reasonable supportive measures for both Parties. Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate and reasonably available, and are offered, without fee or charge to the Parties, to restore or preserve access to CSCU's education program or activity, including measures designed to protect the safety of all Parties and/or CSCU's educational environment and/or to deter discrimination, harassment, and/or retaliation.

Supportive measures may vary depending on what CSCU determines is reasonably available. Supportive measures must not unreasonably burden either Party. The Title IX/Equity Coordinator or their designee will provide contact information for relevant campus resources and services (i.e., campus counseling services, academic resources, employee counseling, union representation) as needed, and can assist in contacting campus resources and services as needed. CSCU will maintain the confidentiality of supportive measures, provided that confidentiality does not impair CSCU's ability to provide those supportive measures. CSCU will act to ensure as minimal an academic/occupational impact on the Parties as possible.

Supportive measures for students or employees could include (when available and applicable), but are not limited to:

- Referral to counseling, medical, and/or other healthcare services
- Referral to the Employment Assistance Program
- Referral to community-based support services
- Academic support, extensions of deadlines or other course-related adjustments
- Modifications of work or class schedules
- Safety planning

- Campus escort services
- Restrictions on contact between the parties (no contact orders)
- Changes in work or housing locations
- Leaves of absence
- Increased security and monitoring of certain areas of the campus
- Education to the institutional community or a subgroup of the community
- Any other actions deemed appropriate and reasonable

It is important to note that a Complainant may receive supportive measures even if they choose not to initiate a Complaint under these procedures. The Title IX/Equity Coordinator may consult with other CSCU officials, such as Behavior Intervention Teams (BIT), Human Resources, campus security, disability services, and others in order to make appropriate determinations regarding supportive measures.

The Parties are provided with a timely opportunity to seek modification or reversal of CSCU's decision to provide, deny, modify, or terminate supportive measures applicable to them. A request to do so should be made in writing to the Title IX/Equity Coordinator. An impartial employee other than the employee who implemented the supportive measures, who has authority to modify or reverse the decision, will determine whether to provide, deny, modify, or terminate the supportive measures if they are inconsistent with the definition of supportive measures above. CSCU will also provide the Parties with the opportunity to seek additional modification or termination of supportive measures applicable to them if circumstances change materially. CSCU typically renders decisions on supportive measures within seven (7) days of receiving a request and provides a written determination to the impacted Party or Parties and the Title IX/Equity Coordinator.

Title IX/Equity Coordinator Authority to Initiate a Complaint

If the Complainant does not wish to file a Complaint, the Title IX/Equity Coordinator, who has an obligation under law to exercise discretion as to whether a Complaint is initiated, will offer supportive measures and determine whether to initiate a Complaint themselves. To make this determination, the Title IX/Equity Coordinator will evaluate that request to determine if there is a serious and imminent threat to someone's safety or if the CSCU cannot ensure equal access without initiating a Complaint. The Title IX/Equity Coordinator will consider the following factors, including other relevant information, to determine whether to file a Complaint:

- The Complainant's request not to proceed with initiation of a Complaint
- The Complainant's reasonable safety concerns regarding initiation of a Complaint
- The risk that additional acts of harassment, discrimination, and/or retaliation would occur if a Complaint were not initiated
- The severity of the alleged harassment, discrimination, and/or retaliation, including whether the conduct, if proven, would require the removal of a Respondent from campus or imposition of another disciplinary sanction to end the discrimination and prevent its recurrence
- The age and relationship of the Parties, including whether the Respondent is an employee
- The scope of the alleged harassment, discrimination, and/or retaliation, including information suggesting a pattern, ongoing harassment, discrimination, and/or retaliation, or conduct alleged to have impacted multiple individuals
- The availability of evidence to assist a Decision-maker in determining whether harassment, discrimination, and/or retaliation occurred
- Whether the College/University could end the alleged harassment, discrimination, and/or retaliation and prevent its recurrence without initiating its resolution process

If deemed necessary, the Title IX/Equity Coordinator may consult with appropriate College/University employees, and/or conduct a threat assessment to aid their determination whether to initiate a Complaint. When the Title IX/Equity Coordinator initiates a Complaint, they do not become the Complainant. The Complainant is the person who experienced the alleged conduct that could constitute a violation of the Policy.

Emergency Removal/Interim Suspension of a Student

CSCU may remove a student on an emergency basis accused of discrimination on the basis of sex or sex-based harassment upon receipt of a Report, a Complaint, or at any time during the Resolution Process. Prior to an emergency removal, CSCU will conduct an individualized risk assessment and may remove the student if that assessment determines that an imminent and serious threat to the health or safety of a Complainant or any students, employees, or other persons arising from the allegations justifies such action. Students accused of other forms of discrimination or harassment (not sex or sex-based) are subject to Interim Administrative Action (interim suspension) under the Interim Student Code of Conduct ([BOR Policy 2.01](#)).

When an emergency removal is imposed, wholly or partially, the affected student will be notified of the action, which will include a written rationale, and the option to challenge the emergency removal within two (2) days of the notification. Upon receipt of a challenge, the Title IX/Equity Coordinator will meet with the student (and their Advisor, if desired) as soon as reasonably possible thereafter to allow them to show cause why the removal/action should not be implemented or should be modified. This meeting is not a hearing on the merits of the allegation(s), but rather is an administrative process intended to determine solely whether the emergency removal is appropriate, should be modified, or lifted. If this meeting is not requested within two (2) days, objections to the emergency removal will be deemed waived. A student can later request a meeting to show why they are no longer an imminent and serious threat because conditions related to imminence or seriousness have changed. A Complainant and their Advisor may be permitted to participate in this meeting if the Title IX/Equity Coordinator determines it is equitable to do so.

The Respondent may provide information, including expert reports, witness statements, communications, or other documentation for consideration prior to or during the meeting. When applicable, a Complainant may provide information to the Title IX/Equity Coordinator for review.

An emergency removal may be affirmed, modified, or lifted as a result of a requested review or as new information becomes available. The Title IX/Equity Coordinator will communicate the final decision in writing, typically within three (3) days of the review meeting.

Placing an Employee on Leave

Employees are subject to existing policies and procedures for interim actions and leaves.

Dismissal of a Complaint

CSCU may dismiss a Complaint if, at any time during the Resolution Process, one or more of the following grounds are met:

- CSCU is unable to identify the Respondent after taking reasonable steps to do so
- CSCU no longer enrolls or employs the Respondent
- A Complainant voluntarily withdraws any or all of the allegations in the Complaint in writing, and the Title IX/Equity Coordinator declines to initiate a Complaint

- CSCU determines the conduct alleged in the Complaint would not constitute a violation of the Policy, if proven

An Investigator(s) and/or Final Decision-maker may recommend dismissal to the Title IX/Equity Coordinator, if they believe the grounds are met. A Complainant who decides to withdraw a Complaint may later request to reinstate or refile it.

Upon any dismissal, CSCU will promptly send the Complainant written notification of the rationale for the dismissal. If the dismissal occurs after the Respondent has been made aware of the allegations, CSCU will also notify the Respondent of the dismissal.

Appeal of a Dismissal

The Title IX/Equity Coordinator will implement dismissal appeal procedures equally for the Parties. The Title IX/Equity Coordinator will designate a trained Dismissal Appeal Officer from the Pool (see below) who did not take part in the investigation or dismissal of the Complaint. The Parties will have a reasonable and equal opportunity to make a statement in support of, or challenging, the dismissal; and the Parties will be notified in writing of the result of the appeal and the rationale for the result.

The Complainant may appeal a dismissal of their Complaint. The Respondent may also appeal the dismissal of the Complaint if dismissal occurs after the Respondent has been made aware of the allegations. All dismissal appeal requests must be filed within five (5) days of the notification of the dismissal.

The Title IX/Equity Coordinator will notify the Parties of any submitted appeal of the dismissal. If, however, the Complainant appeals, but the Respondent was not yet notified of the Complaint, the Title IX/Equity Coordinator must then provide the Respondent with written notice of the allegations and will notify the Respondent of the Complainant's appeal with an opportunity to respond.

The grounds for dismissal appeals are limited to:

- Procedural irregularity that would change the outcome of the dismissal
- New evidence that would change the outcome of the dismissal and that was not reasonably available when the dismissal was decided;
- The Title IX/Equity Coordinator, Investigator(s), or Final Decision-maker had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that would change the outcome of the dismissal

Upon receipt of a dismissal appeal in writing from one or more Parties, the Title IX/Equity Coordinator will share the petition with the other party and provide five (5) days for other Parties to respond to the request. The appeal should specify at least one of the grounds above and provide any reasons or supporting evidence for why the ground is met. This appeal will be provided in writing to the other Parties, and the Title IX/Equity Coordinator, who will be invited to respond in writing. At the conclusion of the response period, the Title IX/Equity Coordinator will forward the appeal, as well as any response provided by the other Parties to the Dismissal Appeal Officer for consideration.

If the Request for Appeal does not provide information that meets the grounds in this Policy, the request will be denied by the Dismissal Appeal Officer, and the Parties, their Advisors, and the Title IX/Equity Coordinator will be notified in writing of the denial and the rationale. If any of the asserted grounds in the appeal satisfy the grounds described in this Policy, then the Dismissal Appeal Officer will

notify all Parties and their Advisors, and the Title IX/Equity Coordinator, of their decision and rationale in writing. The effect will be to reinstate the Complaint.

In most cases, dismissal appeals are confined to a review of the written documentation or record of the original determination and pertinent documentation regarding the specific appeal grounds. The Dismissal Appeal Officer has seven (7) days to review and decide on the appeal, though extensions can be granted at the discretion of the Title IX/Equity Coordinator, and the Parties will be notified of any extension.

Federal Timely Warning Obligations

A College/University must issue timely warnings for reported incidents that pose a serious or continuing threat of bodily harm or danger to members of the College/University community. CSCU will ensure that a Complainant's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of any potential danger.

Counter-Complaints

CSCU is obligated to ensure that the procedures are not abused for retaliatory purposes. Although the CSCU permits the filing of Counter-Complaints, the Title IX/Equity Coordinator (or ECR official, in the case of CT State) will use an initial screening and evaluation, described above, to assess whether the allegations in the Counter-Complaint are made in good faith. When Counter-Complaints are not made in good faith, they will not be permitted. They will be considered potentially retaliatory and may constitute a violation of the Policy. Counter-Complaints determined to have been reported in good faith will be processed using the Resolution Process below. Investigation of such claims may take place concurrently or after resolution of the underlying initial Complaint.

Advisors

The Parties may each have an Advisor (friend, mentor, family member, attorney, union representative, or any other individual a Party chooses) present with them for all meetings, interviews, and proceedings within the Resolution Process, including intake. The Parties may select whomever they wish to serve as their Advisor as long as the Advisor is eligible and available.⁶ Some CSCU institutions may maintain a list of Advisors/support persons. CSCU cannot guarantee equal Advisory rights, meaning that if one Party selects an Advisor who is an attorney, but the other Party does not, or cannot afford an attorney, CSCU is not obligated to provide an attorney to advise that Party.

A Party may elect to change Advisors during the Resolution Process and is not obligated to use the same Advisor throughout. Parties are expected to provide the Title IX/Equity Coordinator with timely notification if they change Advisors. CSCU may permit Parties to have more than one Advisor in unusual circumstances, or an Advisor and a support person, upon special request to the Title IX/Equity Coordinator.

⁶ "Available" means the party cannot insist on an Advisor who simply doesn't have inclination, time, or availability. Also, the Advisor cannot have institutionally conflicting roles, such as being an administrator who has an active role in the matter, or a supervisor who must monitor and implement sanctions. Additionally, choosing an Advisor who is also a witness in the process creates potential for bias and conflicts of interest. A party who chooses an Advisor who is also a witness can anticipate that issues of potential bias will be explored by the Investigator(s) and Final Decision-maker.

CSCU fully respects and accords legal rights for employees, meaning that for Parties who are entitled to union representation, CSCU will allow the unionized employee to have their union representative as well as an Advisor of their choice (if requested) present for all meetings, interviews, and proceedings. To uphold the principles of equity, the other Party (regardless of union membership) will also be permitted to have two Advisors.

Advisors should help the Parties to prepare for each meeting and are expected to advise ethically, with integrity, and in good faith. Advisors may not provide testimony or speak on behalf of their advisee unless given specific permission to do so. CSCU generally expects an Advisor to adjust their schedule to allow them to attend meetings, interviews, and proceedings. CSCU may change scheduled meetings, interviews, and proceedings to accommodate an Advisor's inability to attend, if doing so does not cause an unreasonable delay.

Advisors are entitled to the same opportunity as their advisee to access relevant evidence, and/or the same written investigation report that accurately summarizes this evidence. Advisors are expected to maintain the confidentiality of the records CSCU shares with them. Advisors may not disclose any CSCU work product or evidence CSCU obtained solely through the Resolution Process for any purpose not explicitly authorized by CSCU.

Section 4: Informal Resolution

An Informal Resolution is a structured alternative to the Resolution Process that does not include a formal investigation or finding of responsibility for a violation of the Policy. Informal Resolution may be available following a Report or a Complaint. Informal Resolution mechanisms may be able to repair harm and identify outcomes and a resolution that are agreeable to all Parties, including the College/University.

To initiate Informal Resolution, a Complainant or Respondent may make such a request to the Title IX/Equity Coordinator at any time prior to a final determination, or the Title IX/Equity Coordinator may offer the option to the Parties, in writing. CSCU will obtain voluntary, written confirmation that all Parties wish to resolve the matter through Informal Resolution before proceeding and will not pressure the Parties to participate in Informal Resolution.

Before initiation of an Informal Resolution process, CSCU will provide the Parties with a Notice of Allegation that details:

- The allegations
- The requirements of the Informal Resolution process
- That, prior to agreeing to a resolution, any party has the right to withdraw from the Informal Resolution process and to initiate or resume the Resolution Process
- That the Parties' agreement to a resolution at the conclusion of the Informal Resolution process will preclude the Parties from initiating or resuming the resolution process arising from the same allegations
- The potential terms that may be requested or offered in an Informal Resolution agreement, including notification that an Informal Resolution agreement is binding only on the Parties
- What information CSCU will maintain, and whether and how it could disclose such information for use in its Resolution Process.

An individual facilitating an Informal Resolution must be trained and cannot be the Investigator(s), Final Decision-maker, or Appeal Decision-maker.

It is not necessary to pursue Informal Resolution first in order to pursue a Resolution Process. Any Party participating in Informal Resolution can withdraw from the Informal Resolution at any time and initiate or resume the Resolution Process. The Parties may agree, as a condition of engaging in Informal Resolution, on what statements made or evidence shared during the Informal Resolution process will not be considered in the Resolution Process, should Informal Resolution not be successful, unless agreed to by all Parties.

If an investigation is already underway, CSCU will determine if an investigation will be paused, if it will be limited, or if it will continue during the Informal Resolution process.

Informal Resolution may take one of the following forms, which shall be made available at the discretion of the Title IX/Equity Coordinator:

- 1) **Supportive Resolution.** When the Title IX/Equity Coordinator can resolve the matter informally by providing supportive measures (only) designed to remedy the situation. Typically, the Title IX/Equity Coordinator will meet with the Complainant to determine reasonable supportive measures that are designed to restore or preserve the Complainant's access to CSCU's education program and activity. Such measures can be modified as the Complainant's needs evolve over time or circumstances change. If the Respondent has received notice of the Report, the Title IX/Equity Coordinator may also provide reasonable supportive measures for the Respondent as deemed appropriate. This option is available when the Complainant does not want to engage in the other resolution options, and the Title IX/Equity Coordinator does not initiate a Complaint.
- 2) **Educational Conversation.** When the Title IX/Equity Coordinator can resolve the matter informally by having a conversation with the Respondent to discuss the Complainant's concerns in a Report and College/University expectations or can accompany the Complainant in their desire to confront the conduct. The Complainant(s) may request that the Title IX/Equity Coordinator address their allegations by meeting (with or without the Complainant) with the Respondent(s) to discuss concerning behavior and CSCU policies and expectations. Such a conversation is non-disciplinary and non-punitive. Respondent(s) are not required to attend such meetings, nor are they compelled to provide any information if they attend. The conversation will be documented as the Informal Resolution for the matter, if it takes place. In light of this conversation, or the Respondent's decision not to attend, the Title IX/Equity Coordinator may also implement remedial actions to ensure that policies and expectations are clear and to minimize the risk of recurrence of any behaviors that may not align with the Policy.
- 3) **Accepted Responsibility.** The Respondent may accept responsibility for any or all of the alleged Policy violations at any point during the Resolution Process. If the Respondent indicates an intent to accept responsibility for **all** alleged Policy violations, the ongoing process will be paused, and the Title IX/Equity Coordinator will determine whether Informal Resolution is an option.

If Informal Resolution is available, the Title IX/Equity Coordinator will determine whether all Parties and the College/University (including consultation with other appropriate College/University officials) are able to agree on responsibility, restrictions, sanctions, restorative measures, and/or remedies. If so, the Title IX/Equity Coordinator implements the accepted finding and final determination that the Respondent is in violation of the Policy,

implements agreed-upon restrictions and remedies, and determines the appropriate responses in coordination with other appropriate administrator(s), as necessary. This resolution is not subject to appeal once all Parties indicate their written agreement to all resolution terms. When the Parties cannot agree on all terms of resolution, the Resolution Process will either continue or resume. When a resolution is reached, the appropriate sanction(s) or responsive actions are promptly implemented to effectively stop the harassment, discrimination, and/or retaliation, prevent its recurrence, and remedy the effects of the discriminatory conduct, both on the Complainant and the community.

- 4) **Alternative Resolution.** Alternative Resolution may involve agreement to pursue individual or community remedies, including targeted or broad-based educational programming or training; supported direct conversation or interaction with the Respondent(s); indirect action by the Title IX/Equity Coordinator or other appropriate College/University officials; and other forms of resolution that can be tailored to the needs of the Parties. Some Alternative Resolution mechanisms will result in an agreed-upon outcome, while others are resolved through dialogue. All Parties must consent to the use of an Alternative Resolution approach, and the Parties may, but are not required to, have direct or indirect contact during an Alternative Resolution process. The Title IX/Equity Coordinator may consider the following factors to assess whether Alternative Resolution is appropriate, or which form of Alternative Resolution may be most successful for the Parties:

- The Parties' amenability to Alternative Resolution
- Likelihood of potential resolution, considering any power dynamics between the Parties
- The nature and severity of the alleged misconduct
- The Parties' motivation to participate
- The Parties' civility, rationality and/or goals
- Results of a threat assessment/ongoing risk analysis
- Respondent's disciplinary history
- Whether an emergency removal/interim suspension or other interim action is needed
- Complaint complexity
- Emotional investment/capability of the Parties
- Adequate resources to invest in Alternative Resolution (e.g., time, staff, etc.)

The Title IX/Equity Coordinator has the authority to determine whether Alternative Resolution is available or successful, to facilitate a resolution that is acceptable to all Parties, and/or to accept the Parties' proposed resolution. Parties do not have the authority to stipulate restrictions or obligations for individuals or groups that are not involved in the Alternative Resolution process. The Title IX/Equity Coordinator will determine whether additional individual or community remedies are necessary to meet the College/University's compliance obligations in addition to the Alternative Resolution.

The Title IX/Equity Coordinator maintains records of any Informal Resolution. Failure to abide by an Informal Resolution may result in appropriate responsive/disciplinary actions (e.g., dissolution of the Agreement and resumption of the Resolution Process, referral to a conduct process for failure to

comply, application of the enforcement terms of the Agreement, etc.). The results of Reports or Complaints resolved by Accepted Responsibility or Alternative Resolution are not appealable.

Section 5: Resolution Process

Resolution Timeline

CSCU will make a good faith effort to complete the investigation expeditiously, normally within sixty (60) days, though some investigations may take longer, depending on issues such as the nature, extent, and complexity of the allegations, witness availability, law enforcement involvement, and other factors. Therefore, the timeline may be extended as necessary for appropriate cause by the Title IX/Equity Coordinator, with notification to the Parties.

CSCU may undertake a short delay in its investigation (several days to a few weeks) if circumstances require. Such circumstances include but are not limited to a request from law enforcement to delay the investigation temporarily, the need for language assistance, the absence of Parties and/or witnesses, and/or health conditions. CSCU will promptly resume its Resolution Process as soon as feasible. During such a delay, CSCU will implement and maintain supportive measures for the Parties as deemed appropriate. CSCU action(s) or processes are not typically altered or precluded on the grounds that civil or criminal charges involving the underlying incident(s) have been filed or that criminal charges have been dismissed or reduced.

The Parties will receive regular updates on the progress of the Resolution Process, as well as notification and a rationale for any extensions or delays, and an estimate of how much additional time will be needed to complete the process.

If a Party or witness chooses not to participate in the Resolution Process or becomes unresponsive, CSCU may continue the investigation without their participation to ensure a prompt resolution. Non-participatory or unresponsive Parties retain the rights outlined in this Policy and the opportunity to participate in these procedures.

Ensuring Impartiality

Any individual materially involved in the administration of the Resolution Process, including the Title IX/Equity Coordinator, Investigator(s), and Final and Appeal Decision-maker(s), may neither have nor demonstrate a conflict of interest or bias for a party generally, or for a specific Complainant or Respondent.

The Title IX/Equity Coordinator will vet the assigned Investigator(s), Final Decision-maker, and Appeal Decision-maker(s) for impartiality by ensuring there are no actual or apparent conflicts of interest or disqualifying biases. At any time during the Resolution Process, the Parties may raise a concern regarding bias or conflict of interest, and the Title IX/Equity Coordinator will determine whether the concern is reasonable and supportable. If the source of the conflict of interest or bias is the Title IX/Equity Coordinator, concerns should be raised with the Executive Director of EEO and Civil Rights/Title IX Coordinator at the CSCU System office.

The Resolution Process involves an objective evaluation of all available relevant and not otherwise impermissible evidence, including evidence that supports that the Respondent engaged in a violation of the Policy and evidence that supports that the Respondent did not engage in a violation of the Policy. Credibility determinations may not be based solely on an individual's status or participation as a Complainant, Respondent, or witness. All Parties have a full and fair opportunity, through the

investigation process, to suggest witnesses and questions, to provide evidence, and to receive a written investigation report that accurately summarizes this evidence.

Resolution Process Pool

The Resolution Process relies on a pool of individuals⁷ (“the Pool”) to serve in certain roles. Members of the Pool are trained annually, and can serve in the following roles, typically as assigned by the Title IX/Equity Coordinator:

- Appropriate intake of and initial guidance pertaining to Complaints
- Perform or assist with initial evaluation and provision of Supportive Measures
- Informal Resolution Facilitator
- Investigator(s)
- Final Decision-Maker
- Decision-maker for challenges to emergency removal and supportive measures
- Appeal Decision-maker(s) including for dismissal appeals

The Title IX/Equity Coordinator, in consultation with other individuals as necessary, appoints the Pool, which acts with independence and impartiality.

Notice of Investigation and Allegations

Prior to an investigation, the Title IX/Equity Coordinator will promptly issue a detailed written Notice of Investigation and Allegations (NOIA) to the Parties. The notice will include:

- A meaningful summary of all allegations
- The identity of the involved Parties (if known)
- The precise misconduct being alleged
- The date and location of the alleged incident(s) (if known)
- The specific policies/offenses implicated
- A description of, link to, or copy of the applicable procedures
- A statement that the Parties are entitled to an equal opportunity to access the relevant and not otherwise impermissible evidence
- The name(s) of the Investigator(s), along with a process to identify to the Title IX/Equity Coordinator, in advance of the interview process, any conflict of interest that the Investigator(s) may have
- A statement that CSCU presumes the Respondent is not responsible for the reported misconduct unless and until the evidence supports a different determination
- A statement that determinations of responsibility are made at the conclusion of the process and that the Parties will be given an opportunity to inspect and review all relevant evidence
- A statement that retaliation is prohibited
- A statement that the Parties may have an Advisor of their choice who may accompany them through all steps of the Resolution Process
- Information about the confidentiality of the process, including that the Parties and their Advisors (if applicable) may not share CSCU work product obtained through the Resolution Process

⁷ External, trained third-party neutral professionals may also be used to serve in Pool roles.

- A statement informing the Parties that the CSCU's Policy prohibits knowingly making false statements, including knowingly submitting false information during the Resolution Process
- Detail on how a party may request disability accommodations during the Resolution Process
- An instruction to preserve any evidence that is directly related to the allegations
- A statement that Parties who are members of a union are entitled to union representation throughout the process⁸
- The Parties shall receive a copy of any written Complaint and any written response to it, if any

If, during the course of an investigation, the Title IX/Equity Coordinator and/or Investigator(s) decide to investigate additional allegations that would constitute a violation of CSCU Policy, then the Parties will be notified via an updated NOIA.

CSCU may consolidate Complaints against more than one Respondent, or by more than one Complainant against one or more Respondents, when the allegations arise from the same facts or circumstances or implicate a pattern, collusion, and/or other shared or similar actions.

Investigation

All investigations are adequate, thorough, reliable, impartial, prompt, and fair. A trained CSCU official or other appropriate designee will be assigned to investigate, either as an individual Investigator or as a pair. Investigations involve the gathering of facts and information so as to establish whether it is more likely than not that the reported behavior occurred and whether it was a violation of the Policy detailed in the NOIA.

The Investigator(s) will, when participation of a Party is invited or expected, provide that Party with written notification of the date, time, and location of the meeting or interview, as well as the expected participants and purpose.

Parties may provide written statements to the Investigator(s); however, a written statement is not required. Any written statements must be provided to the Investigator(s) within ten (10) days of the date of the NOIA.

Credibility determinations may not be based solely on an individual's status or participation as a Complainant, Respondent, or witness. All Parties have a full and fair opportunity, through the investigation process, to suggest witnesses and questions and to provide or suggest evidence.

Witnesses

The Parties may, but are not required to, provide a list of potential witnesses to the Investigator(s). Witnesses should be individuals who have direct knowledge of the alleged behavior(s) in the Complaint. The Investigator(s) may also contact witnesses who have not been named by either Party. The Investigator(s) will contact all relevant witnesses and request that they participate in an interview, including any follow-up interviews. Witnesses may also provide written statements to the Investigator(s).

⁸ When a Party is a member of a union, the Party may be asked to acknowledge in writing that they have been advised of this right, and when the Party refuses to make such a written acknowledgment, the Investigator(s) or designee shall notify the applicable Union.

Interviews

Interviews are a regular part of the investigation process. Interviews may be conducted in-person, by phone, or via video conference. The Parties will each be invited to take part in separate interviews, and follow-up interviews may be requested at the Investigator(s)'s discretion. Parties may bring their Advisor to the interview. Parties may also suggest questions they wish the Investigator(s) to ask the other Party and/or witnesses.

Other Evidence

The Investigator(s) may collect additional evidence including, but not limited to: video recordings, security camera footage, audio recordings, phone records, police reports, social media postings, academic records, e-mails, text and social media messages, tangible items, and employee records. The Parties and any witnesses may also submit evidence to the Investigator(s).

Evidentiary Considerations and Impermissible Evidence

The Investigator(s) will only consider evidence that is deemed relevant and not otherwise impermissible. Relevant evidence is that which may aid in determining whether the allegation occurred, or whether the behavior constitutes a violation of the Policy.

Impermissible evidence is defined as:

- Evidence that relates to the Complainant's sexual interests or prior sexual conduct, unless 1) evidence about the Complainant's prior sexual conduct is offered to prove that someone other than the Respondent committed the alleged conduct, or 2) is evidence about specific incidents of the Complainant's prior sexual conduct with the Respondent that is offered to prove consent. The fact of prior consensual sexual conduct between the Complainant and Respondent does not by itself demonstrate or imply the Complainant's consent or preclude a determination that sex-based harassment occurred.
- Evidence that is protected under a privilege as recognized by Federal or State law or evidence provided to a confidential employee, unless the person to whom the privilege or confidentiality is owed has voluntarily waived, in writing, the privilege or confidentiality.
- A Party or witness's records that are made or maintained by a physician, psychologist, or other recognized profession or paraprofessional in connection with the provision of treatment to the Party or witness, unless the Party or witness provides voluntary, written consent for the records to be considered.

Previous disciplinary action of any kind involving the Respondent may not be considered unless there is an allegation of a pattern of misconduct. Barring a pattern allegation, this information is only considered at the sanction stage of the process. Such information may, however, be considered in determining an appropriate sanction following a Final Determination of responsibility.

Within the limitations stated above, the investigation can consider character evidence, if offered and relevant; however, character evidence is not likely to be relevant unless it is fact evidence or relates to a pattern of conduct.

Draft Investigation Report

After completing all interviews and collecting available evidence, the Investigator(s) will compile a draft investigation report, which will be provided to the Parties and the Final Decision-Maker via electronic

copy along with all relevant evidence obtained as part of the investigation for review and comment. The Draft Investigation Report will include draft factual findings, and a summary of evidence gathered, including evidence that relates to credibility. The Parties may provide a written response to the Draft Investigation Report to the Investigator(s) within seven (7) days of receiving it; however, a written response is not required.

Decision-Making Phase

The Title IX/Equity Coordinator will designate an appropriate Final Decision-Maker at the time that the Investigator(s) has provided the Parties with the Draft Investigation Report.

The Decision-making phase typically takes approximately forty (40) days to complete. The Parties will be updated regularly on the timing and any significant deviation from this typical timeline.

Final Questioning Meetings

During or at the conclusion of the seven-day review period, the Final Decision-maker may provide the Investigator(s) with a list of relevant questions to ask the Parties or any witnesses.

During the seven-day review period, the Parties may also provide to the Investigator(s) a proposed list of final questions (if any) to ask the other Parties and any witnesses. The Investigator(s) will promptly share all party-proposed questions with the Final Decision-maker, who will finalize the list with the Investigator(s) to ensure all questions are both relevant and permissible. For any question deemed not relevant or duplicative, the Investigator(s) and/or Final Decision-maker will provide a rationale for not asking the question, either during the final questioning meeting, or in writing.

The Investigator(s) and/or Final Decision-maker will then hold individual meetings with the Parties and witnesses to ask the questions posed by the Final Decision-maker, as well as the questions posed by the Parties that have been deemed relevant and not duplicative, including questions intended to assess credibility. These meetings will be recorded or transcribed. Typically, within two (2) days of the last of these meetings, the recordings or transcripts will be provided to the Parties for review. The Parties will then have three (3) days to review these recordings or transcripts and propose follow-up questions to be asked by the Investigator(s) and/or Final Decision-maker.

The Investigator(s) will review the proposed questions with the Final Decision-maker, to determine relevance and permissibility. If deemed necessary, the Investigator(s) and/or Final Decision-maker will then meet individually with the Parties or witnesses for whom there are relevant, and not duplicative, follow-up questions. These follow-up meetings will also be recorded, and the Parties will receive the recordings or transcripts of these meetings. This final round of questioning is the last such round permitted, unless the Investigator(s) and/or Final Decision-maker determines circumstances necessitate additional questions.

Final Investigation Report and Policy Determination

The Investigator(s) will then incorporate any new, relevant evidence and information obtained through the Parties' review of the Draft Investigation Report and the Final Questioning Meetings into a Final Investigation Report. The Investigator(s) will also respond in writing (typically within the Final Investigation Report) to the relevant elements of the Parties' written responses to the Draft Investigation Report and incorporate relevant elements of the Parties' written responses, additional relevant evidence, and any necessary revisions into the Final Investigation Report.

The Investigator(s) will then objectively evaluate all relevant evidence that is not otherwise impermissible, including both inculpatory and exculpatory evidence. The Investigator(s) then determines, based on the evidence summarized in the Final Investigation Report, whether it is more likely than not that the behavior occurred in final Findings, and whether the behavior was a violation of the Policy in a Final Determination. The Investigator(s)'s determination on each allegation is included in the Final Investigation Report.

When the Investigator(s) determines that the Respondent is not responsible for all allegations, the Investigator(s) will notify the Title IX/Equity Coordinator, who will provide a written Notice of Outcome (see below).

When the Investigator(s) determines that the Respondent is responsible for one or more of the allegations, the Investigator(s) will notify the Title IX/Equity Coordinator and the Parties/Advisors, including providing a copy of the Final Investigation Report.

Final Decision-maker's Determination of Sanctions (when applicable)

When the Investigator(s) determines that the Respondent is responsible for one or more policy violations, the Investigator(s) will provide the Final Decision-maker with the Final Investigation Report and investigation file, including the evidence and information during the Final Questioning Meetings.

The Final Decision-maker will provide the Parties an opportunity to submit a written impact and/or mitigation statement with any additional information that could affect the determination of sanctions. The Final Decision-maker may provide each of the Parties with an opportunity to meet, accompanied by their Advisors and either in person or virtually, with the Final Decision-maker. Any written statements will be submitted within five (5) days and any meetings will typically occur within seven (7) days. Any written submissions will be shared with the other Parties. The Parties will not be permitted to introduce new or additional evidence related to the underlying allegations in written statements or in meetings with the Final Decision-maker.

Following submission of any written statements or the completion of meetings, the Final Decision-maker will then make a final decision regarding any sanctions.

Sanctions

Factors considered by the Final Decision-maker when determining sanctions and responsive actions may include, but are not limited to:

- The nature, severity of, and circumstances surrounding the violation(s)
- The Respondent's disciplinary history
- The need for sanctions/responsive actions to bring an end to the discrimination, harassment, and/or retaliation
- The need for sanctions/responsive actions to prevent the future recurrence of discrimination, harassment, and/or retaliation
- The need to remedy the effects of the discrimination, harassment, and/or retaliation on the Complainant and the community
- The impact on the Parties
- Any other information deemed relevant by the Final Decision-maker(s)

The sanctions described in these Procedures are not exclusive of, and may be in addition to, other actions taken, or sanctions imposed, by external authorities. The sanctions will be implemented as soon as it is feasible once a determination is final, either upon the outcome of any appeal or the expiration of the window to appeal, without an appeal being requested.

Student Sanctions

The following are the common sanctions that may be imposed upon students singly or in combination:

- *Warning/Reprimand*: A formal statement that the conduct was unacceptable and a warning that further violation of any CSCU Policy, procedure, or directive will result in more severe sanctions/responsive actions.
- *Required Counseling*: A mandate to meet with and engage in either CSCU-sponsored or external counseling to better comprehend the misconduct and its effects.
- *Restrictions*: A student may be restricted in their activities, including, but not limited to, being restricted from locations, programs, participation in certain activities or extracurriculars, study abroad, or from holding leadership in student organizations.
- *Probation*: An official sanction for violation of CSCU or College/University Policy, providing for more severe disciplinary sanctions in the event that the student is found in violation of any institutional Policy, procedure, or directive within a specified period of time. Terms of the probation will be articulated and may include denial of specified social privileges, exclusion from co-curricular activities, exclusion from designated areas of campus, no-contact orders, and/or other measures deemed appropriate.
- *Suspension*: Separation from the CSCU, or one or more of its Colleges/Universities or facilities, for a definite period of time, typically not to exceed two years, after which the student is eligible to return. Eligibility may be contingent upon satisfaction of specific conditions noted at the time of suspension, on successfully applying for readmission, or upon a general condition that the student is eligible to return if the institution determines it is appropriate to re-enroll/readmit the student. The student is typically required to vacate institutional property within 24 hours of notification of the action, though this deadline may be extended at the discretion of the Title IX/Equity Coordinator or other appropriate College/University official. During an institution-wide suspension, the student is banned from institutional property, functions, events, and activities unless they receive prior written approval from an appropriate institutional official. This sanction may be enforced with a trespass action, as necessary.
- *Expulsion*: Permanent separation from the CSCU or one or more of its Colleges/Universities. The student is banned from institutional property, and the student's presence at any institution-sponsored activity or event is prohibited. This action may be enforced with a trespass action, as necessary.
- *Withholding Diploma*: CSCU may withhold a student's diploma for a specified period of time and/or deny a student participation in commencement activities as a sanction if the student is found responsible for violating Policy.
- *Revocation of Degree*: Though rare, CSCU reserves the right to revoke a degree previously awarded from a College/University for fraud, misrepresentation, and/or other violation of CSCU or College/University policies, procedures, or directives in obtaining the degree, or for other serious violations committed by a student prior to graduation.
- *Restitution*. Compensation for loss of or damage to property.

- *Other Actions:* In addition to, or in place of, the above sanctions, CSCU may assign any other sanctions as deemed appropriate.

Employee Sanctions and Responsive/Corrective Actions

Responsive actions for an employee who has engaged in harassment, discrimination, and/or retaliation could include, but is not limited to:

- Verbal or Written Warning
- Performance Improvement Plan/Management Process
- Required Counseling
- Required Training or Education
- Extension of a Probationary or Working Test Period
- Loss of Oversight or Supervisory Responsibility
- Demotion
- Transfer
- Shift or schedule adjustments
- Reassignment
- Restriction of Stipends, Research, and/or Professional Development Resources
- Suspension/Administrative Leave with Pay
- Suspension/Administrative Leave without Pay
- Termination
- *Other Actions:* In addition to or in place of the above sanctions/responsive actions, CSCU may assign any other responsive actions as deemed appropriate.

Notice of Outcome

The Title IX/Equity Coordinator or designee provides the Parties with a written Notice of Outcome, within three (3) days of the conclusion of the Resolution Process. The Parties will be notified of any delays.

The Notice of Outcome will specify the Investigator(s)'s Final Determination for each alleged Policy violation with a detailed rationale, any applicable sanctions imposed by the Final Decision-Maker that CSCU is permitted to share pursuant to State or Federal law. The Notice of Outcome will also detail the Parties' equal rights to appeal, the grounds for appeal, the steps to take to request an appeal, and when the outcome is considered final if neither party appeals. The Title IX/Equity Coordinator will provide the Parties with the outcome notification simultaneously, or without significant time delay between notifications.

Appeals

The Title IX/Equity Coordinator will designate a single Appeal Decision-maker or a three-member Appeal Panel chosen from the Pool to hear the appeal. No Appeal Decision-maker(s) will have been previously involved in the Resolution Process for the Complaint, including in any supportive measure or dismissal appeal that may have been heard earlier in the process.

Appeals are limited to the following grounds:

- A procedural irregularity that would change the outcome
- New evidence that would change the outcome and that was not reasonably available at the time the Final Determination regarding responsibility or dismissal was made
- The Title IX/Equity Coordinator, Investigator(s), or Decision-maker(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the specific Complainant or Respondent that would change the outcome

Any Party may submit a written request for appeal to the Title IX/Equity Coordinator within five (5) days of the delivery of the Notice of Outcome. The Request for Appeal will be forwarded to the Appeal Decision-maker for consideration to determine if the request meets the grounds for appeal. This is not a review of the merits of the appeal, but solely a determination as to whether the request could reasonably be construed to meet the grounds and is timely filed.

If the appeal request does not provide information that meets the grounds under these Procedures, the request will be denied by the Appeal Decision-maker, and the Parties and their Advisors will be simultaneously notified in writing of the denial and the rationale.

If the appeal request meets the grounds under these Procedures, then the Appeal Decision-maker will notify all Parties and their Advisors, the Title IX/Equity Coordinator, and, when appropriate, the Investigator(s) and/or the original Decision-maker.

All other Parties and their Advisors, the Title IX/Equity Coordinator, and, when appropriate, the Investigator(s) and/or the Decision-maker will be provided a copy of the appeal request with the approved grounds and then be given five (5) days to submit a response to the appeal. The Appeal Decision-maker will forward all responses, if any, to all Parties for review and comment. The non-appealing party (if any) may also choose to appeal at this time. If so, that appeal request will be reviewed by the Appeal Decision-maker to determine if it meets the grounds under these Procedures and will either be approved or denied. If approved, it will be forwarded to the party who initially requested an appeal, the Title IX/Equity Coordinator, and the Investigator(s) and/or original Decision-maker, as necessary, who will submit their responses, if any, within five (5) days. Any such responses will be circulated for review and comment by all Parties. If denied, the Parties will be notified accordingly, in writing.

The Appeal Decision-maker will collect any additional information needed and all documentation regarding the approved appeal grounds, and the subsequent responses will be shared with the Appeal Decision-Maker, who will promptly render a decision.

In most cases, appeals are confined to a review of the written documentation or record of the original determination and pertinent documentation regarding the specific appeal grounds. The Appeal Decision-maker will deliberate as soon as is practicable and discuss the merits of the appeal. Appeal decisions are to be deferential to the original determination, making changes to the finding only when there is clear error and to the sanction(s)/responsive action(s) only if there is a compelling justification to do so. All decisions are made by majority vote and apply the preponderance of the evidence standard. An appeal is not an opportunity for the Appeal Decision-makers to substitute their judgment for that of the original Decision-maker merely because they disagree with the finding and/or sanction(s).

An appeal may be granted or denied. Appeals that are granted should normally be remanded (or partially remanded) to the original Investigator(s) and/or Decision-maker with corrective instructions for reconsideration. In rare circumstances where an error cannot be cured by the original Investigator(s)

and/or Decision-maker or the Title IX/Equity Coordinator (as in cases of bias), the Appeal Decision-maker may order a new investigation and/or a new determination with new individuals in the Investigator and Decision-maker roles.

A Notice of Appeal Outcome letter will be sent to all Parties simultaneously, or without significant time delay between notifications. The Appeal Outcome will specify the finding on each ground for appeal, any specific instructions for remand or reconsideration, any sanction(s) that may result which CSCU is permitted to share according to federal or state law, and the rationale supporting the essential findings to the extent CSCU is permitted to share under federal or state law.

Once an appeal is decided, the outcome is final and constitutes the final determination; further appeals are not permitted, even if a decision or sanction is changed on remand (except in the case of a new determination). When appeals result in no change to the finding or sanction, that decision is final. When an appeal results in a new finding or sanction, that finding or sanction can be appealed one final time on the grounds listed above and in accordance with these procedures.

If a remand results in a new determination that is different from the appealed determination, that new determination can be appealed, once, on any of the available appeal grounds.

Any sanctions imposed as a result of the determination are stayed (i.e., not implemented) during the appeal process, and supportive measures may be maintained or reinstated until the appeal determination is made.

Section 6: Other Considerations Related to the Resolution Process

Long-Term Remedies/Other Actions

Following the conclusion of the Resolution Process, and in addition to any sanctions implemented or Informal Resolution terms, the Title IX/Equity Coordinator, in consultation with other College/University officials where appropriate, may implement additional long-term remedies or actions with respect to the Parties and/or CSCU community that are intended to stop the discrimination, harassment, and/or retaliation, remedy the effects, and prevent recurrence.

These remedies/actions may include, but are not limited to:

- Referral to counseling and health services
- Referral to the Employee Assistance Program
- Course and registration adjustments, such as retroactive withdrawals
- Education to the individual and/or the community
- Permanent alteration of housing assignments
- Permanent alteration of work arrangements for employees
- Provision of campus safety escorts
- Climate surveys
- Policy modification and/or training
- Provision of transportation assistance
- Implementation of long-term contact limitations between the Parties
- Implementation of adjustments to academic deadlines, course schedules, etc.

Long-term supportive measures that are not punitive in nature may also be provided to the Parties even if no Policy violation is found. When no Policy violation is found, the Title IX/Equity Coordinator will address any remedies to ensure no effective denial of educational access.

CSCU will maintain the confidentiality of any long-term remedies/actions/measures, provided confidentiality does not impair CSCU's ability to provide these services.

Failure to Comply with Sanctions, Responsive Actions, and/or Informal Resolutions

All Respondents are expected to comply with the assigned sanctions, responsive actions, corrective actions, and/or Informal Resolution terms within the timeframe specified by the Final Decision-maker(s), including the Appeal Panel, Final Decision-maker, or the Informal Resolution agreement. Failure to abide by the sanction(s)/action(s) imposed by the date specified, whether by refusal, neglect, or any other reason, may result in additional sanction(s)/action(s), including suspension, expulsion, and/or termination. Supervisors are expected to enforce the completion of sanctions/responsive actions for their employees.

Recordkeeping

For a period of at least seven (7) years following the conclusion of the Resolution Process, CSCU will maintain records of:

- Each discrimination, harassment, and/or retaliation resolution process, including any Final Determination regarding responsibility or appeal, and any audio or audiovisual recording or transcript required under federal regulation
- Any disciplinary sanctions imposed on the Respondent
- Any supportive measures provided to the Parties and any remedies provided to the Complainant or the community designed to restore or preserve equal access to CSCU's education program or activity
- Any appeal and the result therefrom
- Any Informal Resolution and the result therefrom
- All materials used to provide training to the Title IX/Equity Coordinator, Deputy Coordinators, and designees, Investigators, Final Decision-makers, Appeal Decision-makers, Informal Resolution Facilitators, and any person who is responsible for implementing CSCU's Resolution Process, or who has the authority to modify or terminate supportive measures. CSCU will make these training materials available for review upon a request to the Title IX/Equity Coordinator.
- All materials used to train all employees consistent with the requirements under Title IX

CSCU will also maintain any and all records in accordance with state and federal laws.

Disability Accommodations During the Resolution Process

CSCU is committed to providing reasonable accommodations and support to qualified students, employees, or others with disabilities to ensure equal access to CSCU's Resolution Process. Any person needing such accommodations or support should contact the Title IX/Equity Coordinator, who will work with disability support colleagues as appropriate to review the request and, in consultation with the person requesting the accommodation, determine which accommodations are appropriate and necessary for full process participation.

Other Support During the Resolution Process

CSCU will also address reasonable requests for support for the Parties and witnesses, including:

- Language services/Interpreters
- Access and training regarding use of technology throughout the Resolution Process
- Other support as deemed reasonable and necessary to facilitate participation in the Resolution Process

Section 7: Procedures to Provide Modifications for Pregnancy and Related Conditions and Parenting Students

Information Sharing Requirements

Any CSCU employee who becomes aware of a student's pregnancy or related condition is required to provide the student with the Title IX/Equity Coordinator's contact information (including a Deputy Title IX/Equity Coordinator in the case of a CT State campus) and communicate that the Title IX/Equity Coordinator can help take specific actions to prevent discrimination and ensure equal access to CSCU's education program and activity. If the employee has a reasonable belief that the Title IX/Equity Coordinator is already aware of the pregnancy or related condition, the employee is not required to provide the student with the Title IX/Equity Coordinator's contact information.

Upon notification of a student's pregnancy or related condition, the Title IX/Equity Coordinator will contact the student and inform the student of CSCU's obligations to:

- Prohibit sex discrimination
- Provide reasonable modifications
- Allow access, on a voluntary basis, to any separate and comparable portion of CSCU's education program or activity
- Allow a voluntary leave of absence
- Ensure lactation space availability
- Maintain a Resolution Process for alleged discrimination, harassment, and/or retaliation
- Treat pregnancy as comparable to other temporary medical conditions for medical benefit, service, plan, or policy purposes

The Title IX/Equity Coordinator will also notify the student of the process to make a Report or Complaint for alleged discrimination, harassment, and/or retaliation, as applicable.

Reasonable Modifications for Students

Students who are pregnant or are experiencing related conditions are entitled to Reasonable Modifications to prevent sex discrimination and ensure equal access to CSCU's education program and activity. Any student seeking Reasonable Modifications must contact the Title IX/Equity Coordinator to discuss appropriate and available Reasonable Modifications based on their individual needs. Students are encouraged to request Reasonable Modifications as promptly as possible, although retroactive modifications may be available in unusual circumstances. Reasonable Modifications are voluntary, and a student can accept or decline the offered Reasonable Modifications. Not all Reasonable Modifications are appropriate for all contexts. Reasonable Modifications may include:

- Breaks during class to express breast milk, breastfeed, or attend to health needs associated with pregnancy or related conditions, including eating, drinking, or using the restroom

- Intermittent absences to attend medical appointments
- Access to online or homebound education
- Changes in schedule or course sequence
- Time extensions for coursework and rescheduling of tests and examinations
- Allowing a student to sit or stand, or carry or keep water nearby
- Counseling
- Changes in physical space or supplies (for example, access to a larger desk or a footrest)
- Elevator access
- A larger uniform or other required clothing or equipment
- Other changes to policies, practices, or procedures determined by or arranged by the Title IX/Equity Coordinator

In situations such as clinical rotations, performances, labs, and group work, the Title IX/Equity Coordinator will work with the student to devise an alternative path to completion, if possible. In progressive curricular and/or cohort-model programs, medically necessary leaves are sufficient cause to explore, where feasible, shifting course order, substituting similar courses, or joining a subsequent cohort when returning from leave, where possible. Students are encouraged to work with their faculty members and CSCU's support systems to devise a plan for how to best address the conditions as pregnancy progresses, anticipate the need for leaves, minimize the academic impact of their absence, and get back on track as efficiently and comfortably as possible. The Title IX/Equity Coordinator will assist with plan development and implementation as needed.

Supporting documentation for Reasonable Modifications will only be required when it is necessary and reasonable under the circumstances to determine which Reasonable Modifications to offer to determine other specific actions to take to ensure equal access.

Information about pregnant students' requests for modifications will be shared with faculty and staff only to the extent necessary to provide the Reasonable Modification.

Students experiencing pregnancy-related conditions that manifest as a temporary disability under federal or state disability laws are eligible for reasonable accommodations just like any other student with a temporary disability. The Title IX/Equity Coordinator will consult with the College/University's disability services staff to ensure the student receives reasonable accommodation for their disability as required by law.

Certification to Participate

All students should be informed of health and safety risks related to participation in academic and co-curricular activities, regardless of pregnancy status. A student may not be required to provide health care provider or other certification that the student is physically able to participate in the program or activity, unless:

- The certified level of physical ability or health is necessary for participation;
- The institution requires such certification of all students participating; and
- The information obtained is not used as a basis for pregnancy-related discrimination.

Lactation Space Access

CSCU provides students and employees with access to lactation spaces that are functional, appropriate, and safe. Such spaces are regularly cleaned, shielded from view, and free from the intrusion of others. Individuals needing access to lactation spaces may contact the Title IX/Equity Coordinator.

Section 8: Revision of these Procedures

These procedures succeed any previous procedures addressing discrimination, harassment, sexual misconduct and retaliation for incidents occurring on or after August 1, 2024. The Executive Director of EEO and Civil Rights/Title IX Coordinator will regularly review and update these procedures. CSCU reserves the right to make changes to these procedures as necessary, and once those changes are posted online, they are in effect.

If governing laws or regulations change, or court decisions alter legal requirements in a way that impacts these procedures, this document will be construed to comply with the most recent governing laws or regulations or court holdings. This document does not create legally enforceable protections beyond the protections of state and federal laws that frame policies and codes, generally.

These procedures are effective August 1, 2024.

APPENDIX A: Title IX Grievance Procedures for Addressing Formal Complaints of Sexual Harassment for Incidents of Covered Sexual Harassment That Are Alleged to Have Occurred Prior to August 1, 2024 (adapted from procedures last updated on September 17, 2021).

CSCU implemented the below Title IX Grievance Procedures (“Appendix Procedures”) for Covered Sexual Harassment as defined below, effective August 14, 2020, for incidents that occurred between August 14, 2020, and August 31, 2024. To the extent that alleged sexual misconduct falls outside these Appendix Procedures, CSCU retains authority to investigate and adjudicate policy violations under the procedures above. The elements established in these Appendix Procedures are not transferable to any other CSCU for any violation of the Student Code of Conduct, employment policies, or any civil rights violation except as narrowly defined in these Appendix Procedures. These Appendix Procedures do not set a precedent for other policies or processes of the CSCU and may not be cited for or against any right or aspect of any other or process.

These Appendix Procedures only apply to Formal Complaints of Covered Sexual Harassment (as defined below) regarding behavior that is alleged to have occurred between August 14, 2020 and July 31, 2024. Should any portion of the 2020 Title IX Final Rule, 85 Fed. Reg. 30026 (May 19, 2020), be stayed or held invalid by a court of law, or should those federal regulations be withdrawn or modified to not require some or all elements of these Appendix Procedures, these Appendix Procedures will be deemed revoked, and any conduct covered under the Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy shall be resolved under the Procedures above.

Covered Sexual Harassment

For the purposes of these Appendix Procedures, “Covered Sexual Harassment” includes any conduct on the basis of sex that satisfies one or more of the following:

1. An employee conditioning educational benefits on participation in unwelcome sexual conduct (i.e., quid pro quo);
2. Unwelcome conduct that a reasonable person would determine is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the educational institution’s education program or activity;
3. Sexual assault (as defined in the Clery Act), which includes any sexual act directed against another person, without the consent of the victim including instances where the victim is incapable of giving consent;
4. Dating violence (as defined in the Violence Against Women Act (VAWA) amendments to the Clery Act), which includes any violence committed by a person: (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) The length of the relationship; (ii) The type of relationship; (iii) The frequency of interaction between the persons involved in the relationship.
5. Domestic violence (as defined in the VAWA amendments to the Clery Act), which includes any felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under Connecticut domestic or family violence laws or by any other person against an adult or youth victim who

is protected from that person's acts under the domestic or family violence laws of Connecticut.

6. Stalking (as defined in the VAWA amendments to the Clery Act), meaning engaging in a course of conduct directed at a specific person that would cause a reasonable person to-- (A) fear for their safety or the safety of others; or (B) suffer substantial emotional distress.

Consent

For the purposes of these Appendix Procedures, "consent" refers to "affirmative consent." Affirmative consent means an active, clear and voluntary agreement by a person to engage in sexual activity with another person.

Education Program or Activity

For the purposes of these Appendix Procedures, CSCU's "education program or activity" includes:

- Any on-campus premises
- Any off-campus premises that CSCU has substantial control over. This includes buildings or property owned or controlled by a recognized student organization.
- Activity occurring within computer and internet networks, digital platforms, and computer hardware or software owned or operated by, or used in the operations of CSCU's programs and activities over which CSCU has substantial control.

Formal Complaint

For the purposes of these Appendix Procedures, "Formal Complaint" means a document, including an electronic submission, filed by a Complainant with a signature or other indication that the Complainant is the person filing the Formal Complaint, or signed by the Title IX/Equity Coordinator, alleging Covered Sexual Harassment against a Respondent about conduct within CSCU's education program or activity and requesting initiation of the procedures consistent with these Appendix Procedures to investigate the allegation.

Complainant

For the purposes of these Appendix Procedures, Complainant means any individual who has reported being or is alleged to be the victim of conduct that could constitute Covered Sexual Harassment.

Relevant evidence and questions

"Relevant" evidence and questions refer to any questions and evidence that tends to make an allegation of Covered Sexual Harassment more or less likely to be true. "Relevant" evidence and questions do not include the following types of evidence and questions, which are deemed "irrelevant" at all stages of these Appendix Procedures:

- Evidence and questions about the Complainant's sexual predisposition or prior sexual behavior unless:
 - They are offered to prove that someone other than the Respondent committed the

- conduct alleged by the Complainant, or
 - They concern specific incidents of the Complainant’s prior sexual behavior with respect to the Respondent and are offered to prove consent.
- Evidence and questions that constitute, or seek disclosure of, information protected under a legally-recognized privilege. Any party’s medical, psychological, and similar records unless the party has given voluntary, written consent.

Respondent

For the purposes of these Appendix Procedures, Respondent means any individual who has been reported to be the perpetrator of conduct that could constitute Covered Sexual Harassment.

School Calendar Days

For the purposes of these Appendix Procedures, “school calendar days” means the weekdays (Mondays through Fridays) when classes are in session.

Privacy vs. Confidentiality

References made to *confidentiality* refer to the ability of identified confidential resources to not report crimes and violations to law enforcement or college officials without permission, except for extreme circumstances, such as a health and/or safety emergency or child abuse. References made to *privacy* mean CSCU offices and employees who cannot guarantee confidentiality but will maintain privacy to the greatest extent possible, and information disclosed will be relayed only as necessary to investigate and/or seek a resolution and to notify the Title IX/Equity Coordinator or designee, who is responsible for tracking patterns and spotting systemic issues. CSCU will limit the disclosure as much as practicable, even if the Title IX Coordinator determines that the request for confidentiality cannot be honored.

Disability Accommodations

These Appendix Procedures do not alter any institutional obligations under federal disability laws including the Americans with Disabilities Act of 1990, and Section 504 of the Rehabilitation Act of 1973. Parties may request reasonable accommodations for disclosed disabilities to the Title IX/Equity Coordinator at any point before or during these Appendix Procedures that do not fundamentally alter the process provided by these Appendix Procedures. The Title IX/Equity Coordinator will not affirmatively provide disability accommodations that have not been specifically requested by the Parties, even where the Parties may be receiving accommodations in other institutional programs and activities.

Non-Investigatory Measures Available Under these Appendix Procedures

Supportive Measures

Complainants who report allegations that could constitute Covered Sexual Harassment under these Appendix Procedures, have the right to receive supportive measures from CSCU regardless of whether they desire to file a Formal Complaint. Supportive measures are non-disciplinary and non-punitive. As appropriate, supportive measures may include, but not be limited to:

- Counseling
- Extensions of deadlines or other course-related adjustments

- Modifications of work or class schedules
- Campus escort services
- Restrictions on contact between the parties (no contact orders)
- Changes in work or housing locations
- Leaves of absence
- Increased security and monitoring of certain areas of the campus

Emergency Removal

CSCU retains the authority to remove a Respondent from CSCU program or activity on an emergency basis, where CSCU (1) undertakes an individualized safety and risk analysis and (2) determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of Covered Sexual Harassment justifies a removal. If CSCU determines such removal is necessary, the respondent will be provided notice and an opportunity pursuant to Emergency Removal provision described in the Procedures above.

Administrative Leave

CSCU retains the authority to place a non-student employee respondent on administrative leave during these Appendix Procedures, consistent with collective bargaining agreements and human resource policies.

Filing a Formal Complaint

The timeframe for these Appendix Procedures begins with the filing of a Formal Complaint. These Appendix Procedures will be concluded within a reasonably prompt manner, and no longer than ninety (90) school calendar days after the filing of the Formal Complaint, provided that the timeframe under these Appendix Procedures may be extended for a good reason, including but not limited to the absence of a Party, a Party's Advisor, or a witness; concurrent law enforcement activity; or the need for language assistance or accommodation of disabilities. The procedure for applying for extensions is described below.

To file a Formal Complaint, a Complainant must provide the Title IX/Equity Coordinator with a written, signed Complaint describing the facts alleged. Complainants are only able to file a Formal Complaint under these Appendix Procedures if they were participating in, or attempting to participate in, the education programs or activities of CSCU at the time of the alleged incident(s), including as an employee. For Complainants who do not meet this criteria, CSCU will use the Procedures above.

If a Complainant does not wish to make a Formal Complaint, the Title IX/Equity Coordinator may determine a Formal Complaint is necessary. CSCU will inform the Complainant of this decision in writing, and the Complainant need not participate in the process further but will receive all notices issued under these Appendix Procedures. Nothing in these Appendix Procedures prevents a Complainant from seeking the assistance of state or local law enforcement alongside the appropriate on-campus process.

Informal Resolution

A Complainant who files a Formal Complaint may elect, at any time, to address the matter through

the Informal Resolution Process describe above. All Parties to a Formal Complaint must consent in writing to pursue an Informal Resolution.

Multi-Party Situations

CSCU may consolidate Formal Complaints alleging Covered Sexual Harassment against more than one Respondent, or by more than one Complainant against one or more Respondents, or by one Party against the other Party, where the allegations of Covered Sexual Harassment arise out of the same facts or circumstances.

Determining Jurisdiction

The Title IX/Equity Coordinator will determine if these Appendix Procedures should apply to a Formal Complaint. These Appendix Procedures will apply when all of the following elements are met, in the reasonable determination of the Title IX/Equity Coordinator:

- The conduct is alleged to have occurred on or after August 14, 2020, but before August 1, 2024;
- The conduct is alleged to have occurred in the United States;
- The conduct is alleged to have occurred in CSCU's education program or activity; and
- The alleged conduct, if true, would constitute Covered Sexual Harassment as defined in these Appendix Procedures.

If all of the elements are met, CSCU will investigate the allegations according to these Appendix Procedures.

Allegations Potentially Falling Under Two Procedures

If the alleged conduct would constitute Covered Sexual Harassment as well as other violations of the Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy, these Appendix Procedures will be applied to the Covered Sexual Harassment conduct. However, any conduct that is unrelated to Covered Sexual Harassment, will be investigated and adjudicated in accordance with other appropriate policies and procedures, as applicable.

Mandatory Dismissal

If any one of the above elements are not met, the Title IX/Equity Coordinator will notify the Parties that the Formal Complaint is being dismissed for the purposes of these Appendix Procedures. Each Party may appeal this dismissal using the procedure outlined in "Appeals," below.

Discretionary Dismissal

The Title IX/Equity Coordinator may dismiss a Formal Complaint brought under these Appendix Procedures, or any specific allegations raised within that Formal Complaint, at any time during the investigation or hearing, if:

- The Complainant notifies the Title IX/Equity Coordinator in writing that they would like to withdraw the Formal Complaint or any allegations raised in the Formal Complaint;
- The Respondent is no longer enrolled or employed by CSCU, or,
- If specific circumstances prevent CSCU from gathering evidence sufficient to reach a determination regarding the Formal Complaint or allegations within the Formal Complaint.

Any Party may appeal a dismissal determination using the process set forth in “Appeals,” below.

Notice of Dismissal

Upon reaching a decision that the Formal Complaint will be dismissed, CSCU will promptly send written notice of the dismissal of the Formal Complaint or any specific allegation within the Formal Complaint, and the reason for the dismissal, simultaneously to the Parties through their institutional email accounts. It is the responsibility of Parties to maintain and regularly check their email accounts.

Notice of Removal

Upon dismissal under these Appendix Procedures, CSCU retains discretion to utilize other policies and procedures to determine if a violation of other CSCU or College/University policies has occurred. If so, CSCU will promptly send written notice of the dismissal of the Formal Complaint under these Appendix Procedures and removal of the allegations to the appropriate referral process.

Notice of Allegations

The Title IX/Equity Coordinator will draft and provide the Notice of Allegations to any Party to the allegations of Covered Sexual Harassment. Such notice will occur as soon as practicable, after CSCU receives a Formal Complaint of the allegations, if there are no extenuating circumstances. The Parties will be notified by their CSCU-issued email accounts if they are a student or employee, and by other reasonable means if they are neither. CSCU will provide sufficient time for the parties to review the Notice of Allegations and prepare a response before any initial interview.

The Title IX/Equity Coordinator may determine that the Formal Complaint must be dismissed on the mandatory grounds identified above, and will issue a Notice of Dismissal. If such a determination is made, any Party to the allegations of Covered Sexual Harassment identified in the Formal Complaint will receive the Notice of Dismissal in conjunction with, or in separate correspondence after, the Notice of Allegations.

Contents of Notice

The Notice of Allegations will include the following:

- Notice of and a copy of CSCU’s Appendix Procedures.
- Notice of the allegations potentially constituting Covered Sexual Harassment, and sufficient details known at the time the Notice is issued, such as the identities of the Parties involved in the incident, if known, including the Complainant; the conduct allegedly constituting Covered Sexual Harassment and the policy violated; and the date and location of the alleged incident, if known.
- A statement that the Respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process.
- A statement that the Parties may have an Advisor of their choice, who may be, but is not required to be, an attorney, as required under federal law;
- A statement that before the conclusion of the investigation, the Parties may inspect and review evidence obtained as part of the investigation that is directly related to the

allegations raised in the Formal Complaint, including the evidence upon which CSCU does not intend to rely in reaching a determination regarding responsibility, and evidence that both tends to prove or disprove the allegations, whether obtained from a party or other source, as required under federal law;

- A statement that prohibits knowingly making false statements or knowingly submitting false information during these Appendix Procedures.

Ongoing Notice

If, in the course of these Appendix Procedures, the institution decides to investigate allegations about the Complainant or Respondent that are not included in the Notice of Allegations and are otherwise Covered Sexual Harassment falling within these Appendix Procedures, CSCU will notify the Parties whose identities are known of the additional allegations by their CSCU-issued email accounts or other reasonable means. The Parties will be provided sufficient time to review the additional allegations to prepare a response before any initial interview regarding those additional charges.

Advisor of Choice and Participation of Advisor of Choice

CSCU will provide the Parties equal access to Advisors and support persons; any restrictions on Advisor participation will be applied equally.

CSCU has a long-standing practice of requiring students to participate in the process directly and not through an advocate or representative. Students participating as Complainant or Respondent in this process may be accompanied by an Advisor of Choice to any meeting or hearing to which they are required or are eligible to attend. The Advisor of Choice is not an advocate. Except where explicitly stated by these Appendix Procedures, as consistent with federal law, Advisors of Choice shall not participate directly in the process as per standard policy and practice of CSCU.

CSCU will not intentionally schedule meetings or hearings on dates where the Advisors of Choice for all Parties are not available, provided that the Advisors act reasonably in providing available dates and work collegially to find dates and times that meet all schedules.

CSCU's obligations to investigate and adjudicate in a prompt timeframe under Title IX and other policies apply to matters governed under these Appendix Procedures, and CSCU cannot agree to extensive delays solely to accommodate the schedule of an Advisor of Choice. The determination of what is reasonable shall be made by the Title IX/Equity Coordinator or designee. CSCU will not be obligated to delay a meeting or hearing under this process more than five (5) school calendar days due to the unavailability of an Advisor of Choice and may offer the Party the opportunity to obtain a different Advisor of Choice or utilize one provided by CSCU.

Notice of Meetings and Interviews

CSCU will provide, to a Party whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings with a Party, with sufficient time for the party to prepare to participate.

Delays

Each Party may request a one-time delay in these Appendix Procedures of up to five (5) school calendar

days for good cause (granted or denied in the sole judgment of the Title IX/Equity Coordinator or designee) provided that the requestor provides reasonable notice and the delay does not overly inconvenience other Parties. For example, a request to take a five day pause made an hour before a hearing for which multiple Parties and their Advisors have traveled to and prepared for shall generally not be granted, while a request for a five day pause in the middle of investigation interviews to allow a Party to obtain certain documentary evidence shall generally be granted. The Title IX/Equity Coordinator or designee shall have sole judgment to grant further pauses under these Appendix Procedures.

Investigation

General Rules of Investigations

An investigator designated by the Title IX/Equity Coordinator will perform an investigation under a reasonably prompt timeframe of the conduct alleged to constitute Covered Sexual Harassment after issuing the Notice of Allegations.

CSCU and not the Parties, has the burden of proof and the burden of gathering evidence, i.e. the responsibility of showing a violation of Title IX has occurred. This burden does not rest with either Party, and either Party may decide not to share their account of what occurred or may decide not to participate in an investigation or hearing. This does not shift the burden of proof away from CSCU and does not indicate responsibility.

CSCU cannot access, consider, or disclose medical records without a waiver from the Party (or parent, if applicable) to whom the records belong or of whom the records include information. CSCU will provide an equal opportunity for the Parties to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence, (i.e. evidence that tends to prove and disprove the allegations) as described below.

Inspection and Review of Evidence

Prior to the completion of the investigation, the Parties will have an equal opportunity to inspect and review the evidence obtained through the investigation. The purpose of the inspection and review process is to allow each Party the equal opportunity to meaningfully respond to the evidence prior to conclusion of the investigation.

Evidence that will be available for inspection and review by the Parties will be any evidence that is directly related to the allegations raised in the Formal Complaint. It will include any:

- Evidence that is relevant, even if that evidence does not end up being relied upon by CSCU in making a determination regarding responsibility;
- Inculpatory or exculpatory evidence (i.e. evidence that tends to prove or disprove the allegations) that is directly related to the allegations, whether obtained from a party or other source.

All Parties must submit any evidence they would like the investigator to consider prior to when the Parties' time to inspect and review evidence begins.

CSCU will send the evidence made available for each Party and each Party's Advisor, if any, to inspect and review through an electronic format or a hard copy. CSCU is not under an obligation to use any specific process or technology to provide the evidence and shall have the sole discretion in terms of

determining format and any restrictions or limitations on access.

The Parties will have ten (10) school calendar days to inspect and review the evidence and submit a written response by email to the investigator. The investigator will consider the parties' written responses before completing the Investigative Report.

Requests to Extend Inspection and Review

CSCU may provide the Parties five (5) school calendar days after the initial inspection and review of evidence, and before the investigator completes their Investigative Report, to provide additional evidence in response to their inspection and review of the evidence, and then provide the Parties five (5) school calendar days to inspect, review, and respond to the Party's additional evidence through a written response to the investigator. Those written responses may be disclosed to the parties.

Any evidence subject to inspection and review will be available at any hearing, including for purposes of cross-examination. The Parties and their Advisors agree not to photograph or otherwise copy the evidence and must sign an agreement not to disseminate any of the evidence subject to inspection and review or use such evidence for any purpose unrelated to these Appendix Procedures.

Inclusion of Evidence Not Directly Related to the Allegations:

Evidence obtained in the investigation that is determined in the reasoned judgment of the investigator not to be directly related to the allegations in the Formal Complaint will not be disclosed, or may be appropriately redacted before the Parties' inspection to avoid disclosure of personally identifiable information of a student. Any evidence obtained in the investigation that is kept from disclosure or appropriately redacted will be documented in a "privilege log" that may be reviewed by the Parties and their Advisors, if any.

Investigative Report

The investigator designated by the Title IX/Equity Coordinator will create an Investigative Report that fairly summarizes relevant evidence, and will provide that Report to the Parties at least ten (10) school calendar days prior the hearing in an electronic format or a hard copy for each Party's review and written response. The Investigative Report is not intended to catalog all evidence obtained by the investigator, but only to provide a fair summary of that evidence. Only relevant evidence (including both inculpatory and exculpatory – i.e. tending to prove and disprove the allegations - relevant evidence) will be referenced in the Investigative Report. The investigator may redact irrelevant information from the Investigative Report when that information is contained in documents or evidence that is/are otherwise relevant.

Hearing

General Rules of Live Hearings

CSCU will not issue a disciplinary sanction arising from an allegation of Covered Sexual Harassment without holding a live hearing unless otherwise resolved through an informal resolution process.

The live hearing may be conducted with all Parties physically present in the same geographic location,

or, at CSCU's discretion, any or all Parties, witnesses, and other participants may appear at the live hearing virtually through remote video conferencing. This technology will enable participants simultaneously to see and hear each other. At its discretion, CSCU may delay or adjourn a hearing based on technological errors not within a Party's control.

All proceedings will be recorded through either an audio recording, audiovisual recording or transcript. That recording or transcript will be made available to the Parties for inspection and review.

Prior to obtaining access to any evidence, the Parties and their advisors must sign an agreement not to disseminate any of the testimony heard or evidence obtained in the hearing or use such testimony or evidence for any purpose unrelated to these Appendix Procedures. Once signed, this Agreement may not be withdrawn.

Continuances or Granting Extensions

CSCU may determine that multiple sessions or a continuance (i.e. a pause on the continuation of the hearing until a later date or time) is needed to complete a hearing. If so, CSCU will notify all participants and endeavor to accommodate all participants' schedules and complete the hearing as promptly as practicable.

Newly-discovered Evidence

As a general rule, no new evidence or witnesses may be submitted during the live hearing. If a Party identifies new evidence or witnesses that were not reasonably available prior to the live hearing and could affect the outcome of the matter, the Party may request that such evidence or witnesses be considered at the live hearing.

The Hearing Official/Panel will consider this request and make a determination regarding (1) whether such evidence or witness testimony was actually unavailable by reasonable effort prior to the hearing, and (2) whether such evidence or witness testimony could affect the outcome of the matter. The Party offering the newly-discovered evidence or witness has the burden of establishing these questions by the preponderance of the evidence.

If the Hearing Official/Panel answers in the affirmative to both questions, then the Parties will be granted a reasonable pause in the hearing to review the evidence or prepare for questioning of the witness.

Participants in the Live Hearing

Live hearings are not public, and the only individuals permitted to participate in the hearing are as follows:

Complainant and Respondent (The Parties)

- The Parties cannot waive the right to a live hearing.
- CSCU will not threaten, coerce, intimidate or discriminate against the Party in an attempt to secure the Party's participation.
- The hearing body cannot draw an inference about the determination regarding responsibility based solely on a Party's absence from the live hearing or refusal to answer

cross examination or other questions.

The Hearing Body

- The hearing body will consist of a single decision-maker
- No member of the hearing body will also have served as the Title IX/Equity Coordinator, investigator, or Advisor to any party in the case, nor may any member of the hearing body serve on the appeals body in the case.
- No member of the hearing body will have a conflict of interest or bias in favor of or against Complainants or Respondents generally, or in favor or against the Parties to the particular case.
- The hearing body will be trained on topics including how to serve impartially, issues of relevance, including how to apply the rape shield protections provided for Complainants, and any technology to be used at the hearing.
- The Parties will have an opportunity to raise any objections regarding a decision-maker's actual or perceived conflicts of interest or bias at the commencement of the live hearing.

Advisor of Choice

- The Parties have the right to select an Advisor of their choice, who may be, but does not have to be, an attorney.
- The Advisor of choice may accompany the Party to any meeting or hearing they are permitted to attend, but may not speak for the Party, except for the purpose of cross-examination.
- The Parties are not permitted to conduct cross-examination; it must be conducted by the Advisor. As a result, if a Party does not select an Advisor, the institution will select an Advisor to serve in this role for the limited purpose of conducting the cross-examination at no fee or charge to the Party.
- The Advisor is not prohibited from having a conflict of interest or bias in favor of or against Complainants or Respondents generally, or in favor or against the Parties to the particular case.
- The Advisor is not prohibited from being a witness in the matter.
- If a Party does not attend the live hearing, the Party's Advisor may appear and conduct cross-examination on their behalf.
- If neither a Party nor their advisor appear at the hearing, CSCU will provide an Advisor to appear on behalf of the non-appearing party.

Witnesses

- Witnesses cannot be compelled to participate in the live hearing and have the right not to participate in the hearing free from retaliation.

Hearing Procedures

For all live hearings conducted under these Appendix Procedures, the hearing procedure will be as follows:

- The hearing body will open and establish rules and expectations for the hearing;

- The Parties will each be given the opportunity to provide opening statements;
- The hearing body will ask questions of the Parties and witnesses;
- Parties will be given the opportunity for live cross-examination after the hearing body conducts its initial round of questioning; During the Parties' cross-examination, the hearing body will have the authority to pause cross-examination at any time for the purposes of asking the hearing body's own follow up questions; and any time necessary in order to enforce the established rules of decorum.
- Should a Party or the Party's Advisor choose not to cross-examine a Party or witness, the Party shall affirmatively waive cross-examination through a written or oral statement to the hearing body. A Party's waiver of cross-examination does not eliminate the ability of the hearing body to use statements made by the Party.
- The hearing body is allowed to consider statements made by Parties or witnesses that are otherwise permitted under federal law, even if those Parties or witnesses do not participate in cross-examination at the live hearing, in reaching a determination regarding responsibility under these Appendix Procedures.

Live Cross-Examination Procedure

Each Party's Advisor will conduct live cross-examination of the other Party or Parties and witnesses. During this live-cross examination the Advisor will ask the other Party or Parties and witnesses relevant questions and follow-up questions, including those challenging credibility directly, orally, and in real time. Before any cross-examination question is answered, the hearing body will determine if the question is relevant. Cross-examination questions that are duplicative of those already asked, including by the hearing body may be deemed irrelevant if they have been asked and answered.

Review of Transcript/Recording

Either the recording or transcript of the hearing will be available for review by the Parties unless there are any extenuating circumstances. The record/transcript of the hearing will not be provided to Parties or Advisors of choice.

Determination Regarding Responsibility

Standard of Proof

CSCU uses the preponderance of the evidence standard for investigations and determinations regarding responsibility of Formal Complaints covered under these Appendix Procedures. This means that the investigation and hearing determine whether it is more likely than not that a violation occurred.

General Considerations for Evaluating Testimony and Evidence

While the opportunity for cross-examination is required in all hearings under these Appendix Procedures, determinations regarding responsibility may be based in part, or entirely, on documentary, audiovisual, and digital evidence, as warranted in the reasoned judgment of the hearing body.

The hearing body shall not draw inferences regarding a Party or witness' credibility based on the Party or witness' status as a Complainant, Respondent, or witness, nor shall it base its judgments in stereotypes about how a Party or witness would or should act under the circumstances.

Generally, credibility judgments should rest on the demeanor of the Party or witness, the plausibility of their testimony, the consistency of their testimony, and its reliability in light of corroborating or conflicting testimony or evidence.

Still, credibility judgments should not rest on whether a Party or witness' testimony is non-linear or incomplete, or if the Party or witness is displaying stress or anxiety.

Decision makers will afford the highest weight relative to other testimony to first-hand testimony by Parties and witnesses regarding their own memory of specific facts that occurred. Both inculpatory and exculpatory (i.e. tending to prove and disprove the allegations) evidence will be weighed in equal fashion.

Except where specifically barred by federal law, a witness' testimony regarding third-party knowledge of the facts at issue will be allowed, but will generally be accorded lower weight than testimony regarding direct knowledge of specific facts that occurred.

These Appendix Procedures require that the hearing body allow Parties to call "expert witnesses" for direct and cross examination. CSCU does not provide for expert witnesses in other proceedings. While the expert witness will be allowed to testify and be crossed as required under federal law, the decision-maker will be instructed to afford lower weight to non-factual testimony of the expert relative to fact witnesses, and any expert testimony that is not directed to the specific facts that occurred in the case will be afforded lower weight relative to fact witnesses, regardless of whether the expert witness testimony is the subject of cross examination and regardless of whether all Parties present experts as witnesses.

These Appendix Procedures require that CSCU allows Parties to call character witnesses to testify. CSCU does not provide for character witnesses in other proceedings. While the character witnesses will be allowed to testify and be crossed as required under federal law, the decision-maker will be instructed to afford very low weight to any non-factual character testimony of any witness.

These Appendix Procedures require that CSCU admit and allow testimony regarding polygraph tests ("lie detector tests") and other procedures that are outside of standard use in academic and non-academic conduct processes. While the processes and testimony about them will be allowed to testify and be crossed as required under federal law, the decision-maker will be instructed to afford lower weight to such processes relative to the testimony of fact witnesses.

Where a Party or witness' conduct or statements demonstrate that the Party or witness is engaging in retaliatory conduct, including but not limited to witness tampering and intimidation, the hearing body may draw an adverse inference as to that Party or witness' credibility.

Components of the Determination Regarding Responsibility

The written Determination Regarding Responsibility will be issued simultaneously to all Parties through their CSCU email account, or other reasonable means as necessary. The Determination will

include:

- Identification of the allegations potentially constituting Covered Sexual Harassment;
- A description of the procedural steps taken from the receipt of the Formal Complaint through the determination, including any notifications to the Parties, interviews with Parties and witnesses, site visits, methods used to gather other evidence, and hearings held;
- Findings of fact supporting the determination;
- Conclusions regarding which section of these Appendix Procedures, if any, the Respondent has or has not violated.
- For each allegation:
 - A statement of, and rationale for, a determination regarding responsibility;
 - A statement of, and rationale for, any disciplinary sanctions the recipient imposes on the Respondent; and
 - A statement of, and rationale for, whether remedies designed to restore or preserve equal access to CSCU's education program or activity will be provided by CSCU to the Complainant; and
- CSCU's procedures and the permitted reasons for the Complainant and Respondent to appeal (described below in "Appeal").

Timeline of Determination Regarding Responsibility

If there are no extenuating circumstances, the determination regarding responsibility will be issued by CSCU within ten (10) school calendar days of the completion of the hearing.

Finality

The determination regarding responsibility becomes final either on the date that CSCU provides the Parties with the written determination of the result of the appeal, if an appeal is filed consistent with the procedures and timeline outlined in "Appeals" below, or if an appeal is not filed, the date on which the opportunity to appeal expires.

Appeals

Each Party may appeal the dismissal of a Formal Complaint or any included allegations and/or a determination regarding responsibility. To appeal, a Party must submit their written appeal within five (5) school calendar days of being notified of the decision, indicating the grounds for the appeal.

The limited grounds for appeal available are as follows:

- Procedural irregularity that affected the outcome of the matter (i.e. a failure to follow these Appendix Procedures);
- New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter;
- The Title IX/Equity Coordinator, Investigator(s), or decision-maker(s) had a conflict of interest or bias for or against an individual Party, or for or against Complainants or Respondents in general, that affected the outcome of the matter;
- The severity of sanctions.

The submission of appeal stays any sanctions for the pendency of an appeal. Supportive measures and remote learning opportunities remain available during the pendency of the appeal.

If a Party appeals, CSCU will as soon as practicable notify the other Party in writing of the appeal; however, the time for appeal shall be offered equitably to all Parties and shall not be extended for any Party solely because the other party filed an appeal.

Appeals should be submitted in electronic form using ARIAL or TIMES NEW ROMAN, 12 point font, and single-spaced. Appeals should use footnotes, not endnotes. Appeals that do not meet these standards may be returned to the Party for correction, but the time for appeal will not be extended unless there is evidence that technical malfunction caused the appeal document not to meet these standards.

Appeals will be decided by an Appeals Officer, who will be free of conflict of interest and bias, and will not serve as investigator, Title IX/Equity Coordinator, or hearing decision maker in the same matter.

Outcome of appeal will be provided in writing simultaneously to both Parties, and include a rationale for the decision.

Retaliation

CSCU will keep the identity of any individual who has made a Report or Complaint Covered Sexual Harassment confidential, including the identity of any individual who has made a Report or filed a Formal Complaint of Covered Sexual Harassment under these Appendix Procedures, any Complainant, any individual who has been reported to be the perpetrator of sex discrimination, any Respondent, and any witness, except as permitted by the FERPA statute, 20 U.S.C. 1232g, or FERPA regulations, 34 CFR part 99, or as required by law, or to carry out the purposes of 34 CFR part 106, including the conduct of any investigation, hearing, or judicial proceeding under these Appendix Procedures.

No person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX of the Education Amendments of 1972 or its implementing regulations.

No person may intimidate, threaten, coerce, or discriminate against any individual because the individual has made a Report or Complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding or hearing under these Appendix Procedures.

Any intimidation, threats, coercion, or discrimination, for the purpose of interfering with any right or privilege secured by Title IX or its implementing regulations constitutes retaliation. This includes any charges filed against an individual for code of conduct violations that do not involve sex discrimination or sexual harassment, but that arise from the same facts or circumstances as a Report or Complaint of sex discrimination or a report or Formal Complaint of Covered Sexual Harassment.

Complaints alleging retaliation may be filed according to the Procedures promulgated pursuant to the Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy.

Sanctions

See the Procedures above for applicable sanctions.

Connecticut State Colleges and Universities
Discrimination Complaint Procedure on matters
other than Sexual Harassment or Sexual Orientation

The Connecticut State Colleges and Universities (CSCU) has adopted a policy of "zero-tolerance" with respect to unlawful employee harassment. Accordingly, CSCU expressly prohibits any form of unlawful employee harassment based on The Connecticut State Colleges and Universities (CSCU) deems equal employment opportunity to be the education or employment of individuals without consideration of race, color, age, sex, (including sexual harassment, sexual assault, pregnancy and workplace hazards to reproductive systems), religious creed, marital status, national origin, ancestry, past or present history of mental disability, intellectual disability, learning disability, physical disability (including, but not limited to blindness), veteran status, Civil Air Patrol, gender identity or expression, sexual orientation, retaliation, or other factors which cannot lawfully be the basis for employment actions, unless there is a bona fide occupational qualification. CSCU will not request or require genetic information from job applicants or employees, or otherwise discriminate against any person in employment conditions on the basis of genetic information. Additionally, the Connecticut State Colleges and Universities (CSCU) will not discriminate against persons with a prior criminal conviction.

Improper interference with the ability of CSCU employees to perform their expected job duties will not be tolerated.

The following procedure provides periodic training in confidential counseling and grievance investigation for agency counselors. Confidential counseling is completely independent of any other grievance procedure presently in place. It is for the purpose of resolving employee allegations of discrimination at CSCU in an expeditious and informal manner.

This procedure, or submission of a complaint to this procedure, in no way precludes the submission of a complaint of a discriminatory nature to the Commission on Human Rights and Opportunities (CHRO), United State Equal Employment Opportunity Commission (EEOC), United States Department of Education Office of Civil Rights (OCR), United States Department of Justice, United States Department of Labor (DOL) Wage and Hour Division, and any other agencies, state, federal or local, that enforces laws concerning discrimination in employment or public service and accommodation nor, does the establishment of this procedure foreclose any other legal options available to the employee.

Violation of this policy may be grounds for disciplinary action, up to and including dismissal from State Service.

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- **Discrimination Complaint Procedure on Matters Other Than Sexual Harassment or Sexual Orientation**
- **Sexual Harassment Policy and Procedure**
- **Sexual Orientation Discrimination Policy and Procedure**
- **Discrimination Complaint Agencies**

Definition/Legal Basis

Race, Color, Religion, Sex or National Origin

Title VII of the Civil Rights Act of 1964 (as amended) and Executive Order 11246 (as amended) prohibit discrimination in employment against any person (e.g. applicants and employees) on the basis of race, color, religion (religious creed), sex or national origin.

Age

The Age Discrimination in Employment Act of 1967 (ADEA), (as amended) prohibits discrimination in employment on the basis of age against any person (e.g. applicants and employees) age forty (40) or older. Connecticut General Statute Sec. 46a-60 prohibits discrimination based on age and protects any worker eighteen (18) years of age or older.

Disability

The Rehabilitation Act of 1973 defines "disabled individual" as any person who has a physical or mental impairment that substantially limits one or more of such person's major life activities, has a record of impairment, or is regarded as having such an impairment. Section 7(b) of the Rehabilitation Act addresses drug and alcohol abuse, noting that the definition of "disabled individual" does not include any individual who: is "an alcoholic or a drug abuser whose current use of alcohol or drugs prevents such an individual from performing the duties of the job in question or whose employment, by reason of such current alcohol or drug abuse, would constitute a direct threat to the property or the safety of others.

Mental disability refers to an individual who has a record of, or is regarded as having one or more mental disorders, as defined in the most recent edition of the American Psychiatric Association's "Diagnostic and Statistical Manual of Mental Disorders".

Intellectual disability refers to a significant limitation in intellectual functioning existing concurrently with deficits in adaptive behavior that originated during the developmental period before eighteen years of age. "Significant limitation in intellectual functioning" means an intelligence quotient more than two standard deviations below the mean as measured by tests of general intellectual functioning that are individualized, standardized and clinically and culturally appropriate to the individual. "Adaptive behavior" means the effectiveness or degree with which an individual meets the standards of personal independence and social responsibility expected for the individual's age and cultural group as measured by tests that are individualized, standardized and clinically and culturally appropriate to the individual.

Learning disability refers to an individual who exhibits a severe discrepancy between educational performance and measured intellectual ability and who exhibits a disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, which may manifest itself in a diminished ability to listen, speak, read, write, spell or to do mathematical calculations.

Physically disabled refers to any individual who has any chronic physical handicap, infirmity or impairment, whether congenital or resulting from bodily injury, organic processes or changes from illness, including, but not limited to, epilepsy, deafness or hearing impairment or reliance on a wheelchair or other remedial appliance or device."

Veteran refers to any person honorably discharged from, or released under honorable conditions from active service in, the armed forces.

The Americans with Disabilities Act of 1990 (ADA) prohibits discrimination against qualified individuals with disabilities.

The ADA covers individuals who (i) have disabilities, (ii) have records of disabilities, (iii) are perceived as having disabilities, or (iv) are related to or associated with persons who fit into one of the preceding categories.

Resolution - Time Constraints

The Director of EEO will resolve any alleged discrimination or unfair employment practice within ninety (90) calendar days after the receipt of a written complaint. This timeframe includes filing, processing and resolution of such matters.

Records Retention

All records relevant to employee grievances including counseling sessions and informal allegations which result in complaints to enforcement agencies, are maintained, regularly reviewed and reported by the Director of EEO in the Affirmative Action Plan.

Training/Notification

The Connecticut State Colleges and Universities (CSCU) will obtain and provide periodic training in counseling and grievance investigations for agency managers, supervisors and employees.

Employees are notified about the CSCU Discrimination Complaint Procedure when the Affirmative Action Plan has been reviewed by the Commission on Human Rights and Opportunities (CHRO). Employees are also invited to review the Affirmative Action Plan.

Procedure for Handling and Investigating Discrimination Complaints

If you feel you have been a victim of discrimination please follow the following procedures:

1. Complainant requests a meeting with the Director of EEO or designee. The Director of EEO or designee will advise the complainant of his or her rights in accordance with relevant laws and propose possible courses of action.
2. If the complainant is unsatisfied with any of the proposals or if a situation is not readily resolvable the Complainant then has the right to file a written complaint. The written complaint must be filed on the complaint form and should include the following [please note: all grievances should be submitted within thirty (30) days of the alleged discriminatory treatment]:
 - a. Complainant's name
 - b. Work telephone number
 - c. Job title
 - d. Supervisor's name
 - e. Supervisor's Title
 - f. Complainant's home address
 - g. Complainant's home telephone number
 - h. Name of individual against whom the complaint is filed
 - i. The nature of the complaint
 - j. A description of the alleged act (s) of discrimination
 - k. The date (s) the act (s) took place

- l. The date the complaint was filed
 - m. The complainant's signature
3. The Director of EEO or designee will notify the accused party of the particulars of the complaint within seven (7) calendar days after receipt of the written complaint.
4. Upon the filing of a complaint, the Director of EEO or designee will conduct a fact-finding investigation of the complaint. Within thirty (30) calendar days from the filing of the complaint, the Director of EEO or designee will provide a written report to the Complainant, the Respondent, the President and/or a Designee as appropriate. If there is evidence that indicates the Complainant was discriminated against, the parties shall endeavor to resolve the matter within thirty (30) calendar days and/or an administrative action (e.g. discipline up to and including dismissal from State service). If the endeavors at mediation are successful, a written agreement will be prepared for signature (by the Complainant, the Respondent and the Director of EEO or designee).
5. If there is no evidence of discrimination, the Director of EEO or designee will advise the parties involved and dismiss the complaint.
6. If the complainant does not agree with the findings made in the investigation, he/she may appeal for review and reconsideration by the President. Any such appeal must be in writing and be filed within ten (10) calendar days from the date of the written report of the findings and must include specific information or evidence in support of the appeal. The President will advise the Complainant in writing within fourteen (14) calendar days of receipt of the appeal as to their choice of action on the matter.

Retaliation for Discrimination Complaints

Retaliation for filing or participating in a complaint or investigation of discrimination is presumptive employment discrimination in violation of the law and as such will not be tolerated.

Retaliation may be linked to the following activity:

- Disciplining, changing work assignments of, providing inaccurate work information to, or refusing to cooperate or discuss work related matters with an employee because that employee has complained about or resisted harassment, discrimination or retaliation, and
- Intentionally pressuring, falsely denying, lying about or otherwise covering up or attempting to cover up conduct such as that described in any item above.

The above is not to be construed as an all-inclusive list of prohibited acts under this policy. If you feel you have been the subject of retaliation for having filed or taken part in a discriminatory complaint/investigation, please contact the Director of EEO or designee immediately.

5.2	Sexual Misconduct Reporting, Supportive Measures and Processes Policy	20-103	2020-07-29
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**Board of Regents for Higher Education
Connecticut State Colleges and Universities**

**Policy Regarding
Sexual Misconduct Reporting, Supportive Measures and Processes Policy**

STATEMENT OF POLICY

The Board of Regents for Higher Education (BOR) in conjunction with the Connecticut State Colleges and Universities (CSCU) is committed to ensuring that each member of every BOR governed college and university community has the opportunity to participate fully in the process of education and development. The BOR and CSCU strive to maintain a safe and welcoming environment free from acts of sexual misconduct, including, sexual harassment, sexual assault, intimate partner violence and stalking. It is the intent of the BOR and each of its colleges or universities to provide safety, privacy and support to victims of sexual misconduct and intimate partner violence.

The BOR strongly encourages students, parents, bystanders and employees to report any instance of sexual misconduct, including sexual harassment, sexual assault, sexual exploitation, stalking and intimate partner violence. Title IX Coordinators will promptly address these matters and treat all parties equitably. In accordance with federal law Respondents will be presumed not responsible and receive no punitive treatment unless and until found responsible after due process. All BOR governed colleges and universities will provide complainants and respondents with supportive measures, including referral to agencies that provide medical attention, counseling, legal services, advocacy, referrals and general information regarding sexual misconduct.

All CSCU employees and support persons will make any limits of confidentiality clear before any disclosure of facts takes place. Other than confidential resources as defined below and employees who qualify as Campus Security Authorities under the Jeanne Clery Act, all CSCU employees are required to immediately communicate to the institution's Title IX Coordinator any disclosure or report of sexual misconduct received from a student as well as communicate any disclosure or report of sexual misconduct the employee received from another employee when misconduct is related to the business of the institution.

Affirmative consent must be given by all parties before engaging in sexual activity. Affirmative consent means an active, clear and voluntary agreement by a person to engage in sexual activity with another person. Sexual misconduct, as defined herein, is a violation of BOR policies and, in addition, may subject an accused student or employee to criminal penalties. The BOR and each of its governed colleges and universities are committed to providing an environment free of personal offenses. Sexual relationships of any kind between staff/faculty and students are discouraged pursuant to BOR policy.

The Board of Regents for Higher Education hereby directs the Connecticut State Colleges and Universities to implement the Policy stated above pursuant to the following provisions:

TERMS, USAGE AND STANDARDS

Complainant means an individual who is alleged to be the victim of conduct that could constitute sexual harassment.

Sexual Misconduct Reporting
Support Services and Processes Policy

Consent must be affirmed and given freely, willingly, and knowingly of each participant to desired sexual involvement. Consent is a mutually affirmative, conscious decision – indicated clearly by words or actions – to engage in mutually accepted sexual contact. Consent may be revoked at any time during the sexual activity by any person engaged in the activity.

Affirmative consent may never be assumed because there is no physical resistance or other negative response. A person who initially consents to sexual activity shall be deemed not to have affirmatively consented to any such activity which occurs after that consent is withdrawn. It is the responsibility of each person to assure that he or she has the affirmative consent of all persons engaged in the sexual activity to engage in the sexual activity and that affirmative consent is sustained throughout the sexual activity. It shall not be a valid excuse to an alleged lack of affirmative consent that the student or employee responding to the alleged violation believed that the student reporting or disclosing the alleged violation consented to the activity (i) because the responding student or employee was intoxicated or reckless or failed to take reasonable steps to ascertain whether the student or employee reporting or disclosing the alleged violation affirmatively consented, or (ii) if the responding student or employee knew or should have known that the student or employee reporting or disclosing the alleged violation was unable to consent because the student or employee was unconscious, asleep, unable to communicate due to a mental or physical condition, or incapacitated due to the influence of drugs, alcohol or medication. The existence of a past or current dating or sexual relationship between the persons involved in the alleged violation shall not be determinative of a finding of affirmative consent.

Report means a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the institution investigate the allegation of sexual harassment. At the time of the filing the formal complaint, the complainant must be participating in or attempting to participate in an education program or activity of the institution.

Disclosure is the receipt of any communication of an incident of sexual misconduct that is not accompanied by a request for an investigation or adjudication by the institution.

Respondent means an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.

Sexual misconduct includes engaging in any of the following behaviors:

- (a) **Sexual harassment**, which can include any unwelcome sexual advance or request for sexual favors, or any conduct of a sexual nature when submission to such conduct is made either explicitly or implicitly a term or condition of an individual's education or employment; submission to or rejection of such conduct by an individual is used as a basis for academic or employment decisions affecting the individual; or such conduct has the purpose or effect of substantially interfering with an individual's academic or work performance or creating an intimidating, hostile or offensive educational or employment environment. Examples of conduct which may constitute sexual harassment include but are not limited to:

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- sexual flirtation, touching, advances or propositions
- verbal abuse of a sexual nature
- pressure to engage in sexual activity
- graphic or suggestive comments about an individual's dress or appearance
- use of sexually degrading words to describe an individual
- display of sexually suggestive objects, pictures or photographs
- sexual jokes
- stereotypic comments based upon gender
- threats, demands or suggestions that retention of one's educational status is contingent upon toleration of or acquiescence in sexual advances.

(b) ***Sexual assault*** shall include but is not limited to a sexual act directed against another person without the consent (as defined herein) of the other person or when that person is not capable of giving such consent:

Sexual assault is further defined in sections 53a-70, 53a-70a, 53a-70b, 53a-71, 53a-72a, 53a-72b and 53a-73a of the Connecticut General Statutes.

(c) ***Sexual exploitation*** occurs when a person takes non-consensual or abusive sexual advantage of another for anyone's advantage or benefit other than the person being exploited, and that behavior does not otherwise constitute one of the preceding sexual misconduct offenses. Examples of behavior that could rise to the level of sexual exploitation include:

- Prostituting another person;
- Non-consensual visual (e.g., video, photograph) or audio-recording of sexual activity;
- Non-consensual distribution of photos, other images, or information of an individual's sexual activity, intimate body parts, or nakedness, with the intent to or having the effect of embarrassing an individual who is the subject of such images or information;
- Going beyond the bounds of consent (for example, an individual who allows friends to hide in the closet to watch him or her having consensual sex);
- Engaging in non-consensual voyeurism;
- Knowingly transmitting an STI, such as HIV to another without disclosing your STI status;
- Exposing one's genitals in non-consensual circumstances, or inducing another to expose his or her genitals; or
- Possessing, distributing, viewing or forcing others to view illegal pornography.

Sexual exploitation is further defined as a crime in Connecticut State Law.

(d) ***Intimate partner, domestic and/or dating violence means*** any physical or sexual harm against an individual by a current or former spouse of or person in a dating or cohabitating relationship with such individual that results from any action by such spouse or such person that may be classified as a sexual assault under section 53a-70, 53a-70a, 53a-70b, 53a-71, 53a-72a, 53a-72b or 53a-73a of the general statutes, stalking under section 53a-181c, 53a-181d or 53a-181e of the

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general statutes, or domestic or family violence as designated under section 46b-38h of the general statutes. This includes any physical or sexual harm against an individual by a current or former spouse or by a partner in a dating relationship that results from (1) sexual assault (2) sexual assault in a spousal or cohabiting relationship; (3) domestic violence; (4) sexual harassment (5) sexual exploitation, as such terms are defined in this policy.

Offenses that are designated as “domestic violence” are against family or household members or persons in dating or cohabiting relationships and include assaults, sexual assaults, stalking, and violations of protective or restraining orders issued by a Court. Intimate partner violence may also include physical abuse, threat of abuse, and emotional abuse.

- Physical abuse includes, but is not limited to, slapping, pulling hair or punching.
 - Threat of abuse includes but is not limited to, threatening to hit, harm or use a weapon on another (whether victim or acquaintance, friend or family member of the victim) or other forms of verbal threat.
 - Emotional abuse includes but is not limited to, damage to one’s property, driving recklessly to scare someone, name calling, threatening to hurt one’s family members or pets and humiliating another person.
 - Cohabitation occurs when two individuals dwell together in the same place as if married.
 - The determination of whether a “dating relationship” existed is to be based upon the following factors: the complainant’s statement as to whether such a relationship existed, the length of the relationship, the type of the relationship and the frequency of the interaction between the persons reported to be involved in the relationship.
- (e) ***Stalking***, which is defined as repeatedly contacting another person when contacting person knows or should know that the contact is unwanted by the other person; and the contact causes the other person reasonable apprehension of imminent physical harm or the contacting person knows or should know that the contact causes substantial impairment of the other person’s ability to perform the activities of daily life.

As used in this definition, the term “contacting” includes, but is not limited to, communicating with (including internet communication via e-mail, instant message, on- line community or any other internet communication) or remaining in the physical presence of the other person.

Retaliation is prohibited and occurs when a person is subjected to an adverse employment or educational action because he or she made a complaint under this policy or assisted or participated in any manner in an investigation. No institution or person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX or because the individual has made a report of complaint, testified, assisted or participated or refused to participate in any manner in an investigation, proceeding or hearing related to a report or complaint related to sex discrimination.

CONFIDENTIALITY

When a BOR governed college or university receives a report of sexual misconduct all reasonable steps will be taken by the appropriate CSCU officials to preserve the privacy of the complainant and

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respondent while promptly investigating and responding to the report. While the institution will strive to maintain the confidentiality of personally identifiable student information reported, which information is subject to privacy requirements of the Family Education Rights Privacy Act (FERPA), the institution also must fulfill its duty to protect the campus community.

Confidential resources are defined as follows: For the Universities, entities with statutory privilege, which include campus based counseling center, health center and pastoral counseling staff members whose official responsibilities include providing mental health counseling to members of the University community as well as off campus counseling and psychological services, health services providers, member(s) of the clergy, and the local Sexual Assault Crisis Center and Domestic Violence Center. For the Colleges, confidential resources are limited to entities with statutory privilege, such as off campus counseling, on campus counseling where available, and psychological services, health services providers, member(s) of the clergy, and the local Sexual Assault Crisis Center and Domestic Violence Center. The personnel of these centers and agencies are bound by state statutes and professional ethics from disclosing information about reports without written releases.

Information provided to a confidential resource by a complainant or respondent cannot be disclosed legally to any other person without consent, except under very limited circumstances, such as an imminent threat of danger to self or others or if the reported complainant is a minor. Therefore, for those who wish to obtain the fullest legal protections and disclose in full confidentiality, she/he must speak with a confidential resource. Each BOR governed college and university will provide a list of such confidential resources in the College or University's geographic region to complainants and respondents as well as publish these resources on-line and in various publications.

Where it is deemed necessary for the institution to take steps to protect the safety of members of the campus community, the institution will seek to act in a manner so as not to compromise the privacy or confidentiality of the either the complainant or respondent to the extent reasonably possible.

MANDATED REPORTING BY COLLEGE AND UNIVERSITY EMPLOYEES

Other than confidential resources as defined above, in addition to employees who qualify as Campus Security Authorities under the Jeanne Clery Act, all employees are required to immediately communicate to the institution's designated recipient (e.g., Title IX Coordinator) any disclosure or report of sexual misconduct received from a student regardless of the age of the complainant. All employees are also required to communicate to the institution's designated recipient (e.g., Title IX Coordinator) any disclosure or report of sexual misconduct received from an employee that impacts employment with the institution or is otherwise related to the business of the institution.

Upon receiving a disclosure or a report of sexual misconduct, employees are expected to supportively, compassionately and professionally offer academic and other accommodations and to provide a referral for support and other services.

Further, in accordance with Connecticut State law, with the exception of student employees, any paid administrator, faculty, staff, athletic director, athletic coach or athletic trainer who, in the ordinary course of their employment, has a reasonable cause to suspect or believe that a person under the age

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of 18 years has been abused or neglected, has been placed in imminent harm or has had a non-accidental injury is required by law and Board policy to report the incident within twelve hours to their immediate supervisor and to the Department of Children and Families.

RIGHTS OF PARTIES

Complainants and respondents will be informed in a timely manner of all their rights and options, including the necessary steps and potential outcomes of each option. Complainants and respondents shall be offered non-disciplinary, non-punitive individualized services as appropriate and available that are designed to restore or preserve equal access to the institution's education program or activity without unreasonably burdening the other party, which may include measures designed to protect the safety of all parties or the institution's educational environment or deter sexual harassment.

When choosing a reporting resource the following information should be considered:

- All reports of sexual misconduct will be treated seriously and with dignity by the institution.
- Referrals to off-campus counseling and medical services that are available immediately and confidential, whether or not those who report feel ready to make any decisions about reporting to police, a college or university employee or the campus's Title IX Coordinator.
- Information regarding the right to take both criminal and civil legal action against the individual allegedly responsible.
- Those who seek confidentiality may contact a clergy member(s), a University counseling center psychologist, a University health center care provider, the Sexual Assault Crisis Center of Connecticut and/or the Connecticut Coalition Against Domestic Violence – all of whom are bound by state statutes and professional ethics to maintain confidentiality without written releases.

RIGHT TO NOTIFY LAW ENFORCEMENT & SEEK PROTECTIVE AND OTHER ORDERS

Complainants and respondents shall be provided written information about her/his right to:

- (1) notify law enforcement and receive assistance from campus authorities in making the notification; and,
- (2) obtain a protective order, apply for a temporary restraining order or seek enforcement of an existing order. Such orders include:
 - standing criminal protective orders;
 - protective orders issued in cases of stalking, harassment, sexual assault, or risk of injury to or impairing the morals of a child;
 - temporary restraining orders or protective orders prohibiting the harassment of a witness;
 - family violence protective orders.

The institution will also honor lawful protective or temporary restraining orders.

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Each and every BOR governed college and university shall create and provide information specific to its campus detailing the procedures to follow after the commission of such violence, including people or agencies to contact for reporting purposes or to request assistance, and information on the importance of preserving physical evidence.

OPTIONS FOR CHANGING ACADEMIC, HOUSING, TRANSPORTATION AND WORKING ARRANGEMENTS

College and university Title IX Coordinators will provide supportive measures to complainants and respondents. These supportive measures may include, but are not limited to, reasonably available options for changing academic situations, including but not limited to extensions of deadlines or other course related adjustments, modifications of work or class schedules, campus transportation and escort services, mutual restrictions on contact between parties, leaves of absence, increased security and monitoring and housing or working situations.

SUPPORT SERVICES CONTACT INFORMATION

It is BOR policy that whenever a college or university Title IX Coordinator or other employee receives a report of sexual misconduct, the Title IX Coordinator shall immediately provide all parties with contact information for and, if requested, professional assistance in accessing and using any appropriate campus resources, or local advocacy, counseling, health, and mental health services, without fee. All CSU campuses shall develop and distribute contact information for this purpose as well as provide such information on-line.

SEXUAL MISCONDUCT INVESTIGATION AND PROCEDURES

All complaints of sexual misconduct will be reviewed by the college or university Title IX Coordinator who will determine supportive measures and whether the complaint falls within the scope of Title IX. If the institution's Title IX Coordinator determines that the alleged harassment is

- (1) so severe, pervasive, and objectively offensive that it effectively denies a person equal access to an education program or activity; or,
- (2) implicates an employee of the institution, alleging that the employee conditioned a provision of an aid, benefit, or service upon the complainant's participation in unwelcome sexual conduct; or,

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(3) alleges “Sexual assault” as defined in 20 U.S.C. 1092(f)(6)(A)(v)¹, “dating violence” as defined in 34 U.S.C. 12291(a)(10)², “domestic violence” as defined in 34 U.S.C. 12291(a)(8)³, or “stalking” as defined in 34 U.S.C. 12291(a)(30)⁴ as defined in 34 U.S.C. 12291(a)(30)⁵

and

(4) the alleged harassment occurred within the United States on property owned or controlled by the institution or any building owned or controlled by a student organization officially recognized by the institution; and

(5) at the time of the filing the Complainant was participating or attempting to participate in the educational program or activity;

The Title IX coordinator will initiate the Title IX Process which shall be applicable to students, faculty and staff. The Title IX Process and Procedures are available on-line and through the Office of the Title IX Coordinator.

If the institution’s Title IX Coordinator determines that the alleged harassment does not meet the factors above but the alleged misconduct violates BOR Policy, the following procedures apply:

- Each party shall have the opportunity to request that an investigation or disciplinary proceedings begin promptly; that such disciplinary proceedings shall be conducted by an official trained annually in issues relating to sexual assault, stalking and dating, domestic or intimate partner violence and shall use the preponderance of the evidence (more likely than

¹ 20 U.S.C. 1092(f)(6)(A)(v), The term “[sexual assault](#)” means an offense classified as a forcible or non-forcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation.

² 34 U.S.C. 12291(a)(10) The term “[dating violence](#)” means violence committed by a person - (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) The length of the relationship. (ii) The type of relationship. (iii) The frequency of interaction between the persons involved in the relationship.

³ 34 U.S.C. 12291(a)(8) The term “[domestic violence](#)” includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or [youth](#) victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.

⁴ 34 U.S.C. 12291(a)(30) (30) The term “[stalking](#)” means engaging in a course of conduct directed at a specific person that would cause a reasonable person to - (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

⁵ 34 U.S.C. 12291(a)(30) (30) The term “[stalking](#)” means engaging in a course of conduct directed at a specific person that would cause a reasonable person to - (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

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not) standard in accordance with State law in making a determination concerning sexual assault, stalking or domestic/dating/intimate partner violence.

- Both the complainant and respondent are entitled to be accompanied to any meeting or proceeding relating to the allegation of sexual misconduct by an advisor or support person of their choice, provided the involvement of such advisor or support person does not result in the postponement or delay of such meeting as scheduled and provided such an advisor or support person may not directly address the Hearing Body, question witnesses or otherwise actively participate in the hearing process or other meeting pertaining to a report of sexual misconduct and each party shall have the opportunity to present evidence and witnesses on her/his behalf during any disciplinary proceeding.
- Both parties are entitled to be provided at the same time written notice of the results of any disciplinary proceeding, normally within one (1) business day after the conclusion of such proceeding, which notice shall include the following: the name of the respondent the violation committed, if any, and any sanction imposed upon the respondent. Sanctions may range from a warning to expulsion, depending upon the behavior and its severity of the violation(s). The complainant shall have the same right to request a review of the decision of any disciplinary proceeding in the same manner and on the same basis as shall the respondent; however, in such cases, if a review by any complainant is granted, among the other actions that may be taken, the sanction of the disciplinary proceeding may also be increased. Both the complainant and respondent are entitled to be simultaneously provided written notice of any change in the results of any disciplinary proceeding prior to the time when the results become final as well as to be notified when such results become final.

If the institution's Title IX Coordinator determines that the allegations do not constitute a violation of either Title IX or Board policy and can make no finding of responsibility, complainant and respondent shall be notified that the matter shall be closed.

Employee sexual misconduct not subject to Title IX is subject to discipline in accordance with the procedures applicable to the employee's classification of employment.

REVIEW AND AUDIT

The Title IX Coordinator will report to the President of the institution on a regular basis all findings on reported sexual misconduct matters. The Title IX Coordinator shall include within its annual Connecticut General Statute 10a-55m Sexual Misconduct Report a separate report specifically disclosing the number of complaints, the subject matter of each complaint and the final outcome of each case processed under Title IX. At a joint meeting of the Human Resources and Administration Committee and the Academic and Student Affairs Committee, the CSCU Title IX

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Coordinator will report annually on CSCU data of complaints and outcomes of sexual misconduct matters reviewed under Title IX, BOR policies, and other applicable state statutes.

DISSEMINATION OF THIS POLICY

Upon adoption by the Board all CSCU institutions shall, upon receipt, immediately post and maintain this policy at all times in an easily accessible manner on each institution's website, handbook and catalogue. This policy shall thereafter be annually provided to all Title IX Coordinators, campus law enforcement officers and security personnel, and other campus personnel. Further, this policy shall be presented at student orientation and at student awareness and prevention trainings, and made broadly available at each campus. The policy shall be expanded upon by each institution to provide resources and contact information specific to their institution and geographic area as set forth above. This includes but is not limited to the name, office address, email address and telephone number of the Title IX Coordinators.

Connecticut State Colleges and Universities
Sexual Harassment Policy and Procedure

Statement of Policy

It is the policy of the Board of Regents of Higher Education to prohibit harassment of employees by another employee or supervisor on the basis of sex. The purpose of this policy is not to regulate our employees' personal morality; rather it is to assure a workplace that is free of sexual harassment. In this regard, sexually offensive activity will not be tolerated.

Violations of the policy may be grounds for disciplinary action, up to and including dismissal from State Service.

Definition

Sexual harassment is a form of sex discrimination that is prohibited under both Connecticut law and Title VII of the Federal Civil Rights Act of 1964. See C.G.S. 46a-60(a) (8) and 29 C.F.R. 1604.11.

"Sexual harassment" is defined under Connecticut law as: "any unwelcome sexual advances or requests for sexual favors or any conduct of a sexual nature when (A) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (B) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (C) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment."

The Connecticut Courts have distinguished two general categories of sexually harassing behavior: Quid Pro Quo and Hostile Work Environment. The following are descriptions of conduct which constitute each category and are prohibited by this policy.

Quid Pro Quo (literally "this for that")

Quid Pro Quo sexual harassment occurs when an economic or job benefit is conditioned upon the granting of sexual favors. It may also occur when an employee is punished for failing to grant sexual favors in the workplace.

In a Quid Pro Quo case, the sexual overture or conduct is generally clear: for example, the supervisor demands that an employee go out with him or her in exchange for a promotion.

Both federal and state law is violated if the employee's response to such an overture is used as the basis for an employment decision affecting the employee.

Quid Pro Quo harassment may be based on a single incident.

Hostile Work Environment

Sexual harassment may also occur when there is unwanted sexual conduct that creates an intimidating, hostile or offensive work environment, or that has the effect of unreasonably interfering with an individual's work performance. It is not necessarily to show a direct and tangible job or economic loss. This type of claim can be brought against anyone in the workplace, whether it is a supervisor or a coworker.

Conduct that will be considered a violation of this policy includes, but is not limited to the following:

- a. Verbal - includes sexual innuendoes, suggestive comments, insults, jokes of a sexual nature, sexual propositions and threats.
- b. Non-verbal - includes sexually suggestive objects or pictures, graphic commentaries,

- c. suggestive or insulting sounds, leering, whistling and obscene gestures.
- d. Physical - unwanted physical contact, including touching, patting, grabbing, pinching, brushing the body, massaging, coerced sexual intercourse, rape, molestation, sexual assault and battery.
- e. Any other unwelcome conduct of a sexual nature.

Procedure for Handling and Investigating Sexual Harassment Complaints

If you feel you have been a victim of sexual harassment, please adhere to the following procedures:

- 1) Keep a record of the incidents of sexual harassment. Write down the details of the incident: the date, time and location, the names of any witnesses and your response. Include also any notes, letters, pictures, etc. Keep the records in a safe place.
- 2) Seek assistance from the Director of EEO/or designee, any Human Resources staff member, supervisor or manager about the harassment or issues.
- 3) Supervisors and managers will contact the Director of EEO or designee and refer the employee to the Director of EEO or designee. The Director of EEO or designee shall receive both written and verbal complaints and may assist the complainant in preparing a statement of allegations. Anonymous complaints and complaints from the public will also be investigated.
- 4) Within five (5) days of receiving a formal complaint of sexual harassment, the alleged harasser will be contacted by the Director of EEO or designee to set up a meeting and will be presented with a copy of the complaint.
The individual has the right to union representation or other representation at this meeting (as long as bargaining unit members have signed a waiver of union representation) and will be given an opportunity to respond to the charges alleged in the complaint.
- 5) All complaints will be investigated expeditiously by the Director of EEO or designee.
- 6) Discipline will be applied if a violation of this policy is found to have occurred.

When a complaint is made the Director of EEO or designee will have the duty of immediately bringing all sexual harassment and retaliation complaints to the confidential attention of the President.

Retaliation for Sexual Harassment Complaints

Retaliation for having filed or participated in a complaint or investigation of sexual harassment will not be tolerated at the Connecticut State Colleges and Universities System Office or at any Connecticut State College or University.

Records of Complaints and Confidentiality

All records associated with complaints will be maintained in the Director of EEO or designee's Office.

All complaints and investigations will be held in confidence until the conclusion of the investigation. Anyone involved in the intake, investigation, discipline and outcome of a complaint will be disciplined as appropriate for failing to protect the confidentiality of all involved in the investigation and outcome of a complaint.

Connecticut State Colleges and Universities
Sexual Orientation Discrimination Policy and Procedure

Statement of Policy

All employees are prohibited from discriminating against another employee or agent of the Connecticut State Colleges and Universities (CSCU) on the basis of his/her sexual orientation, in accordance with Connecticut General Statutes, Section 46a-81c.

For purposes of this policy, "sexual orientation" means having a preference for heterosexuality, homosexuality, or bisexuality; having a history of such preference; or being identified with such preference.

The following shall be considered a discriminatory practice in violation of this policy and Connecticut General Statutes, Section 46a-81c:

- If an employer, except in the case of a bona fide occupational qualification or need, refuses to hire, or employ, or to bar or to discharge from employment any individual; or to discriminate against him/her in compensation or in terms, conditions, or privileges of employment because of the individual's sexual orientation, or
- If any person, employer, employment agency or labor organization, except in the case of bona fide occupational qualification or need, advertises employment opportunities in a manner that restricts such employment so as to discriminate against individuals because of their sexual orientation.

Nothing in this policy shall be deemed or construed to mean that CSCU authorizes or permits the use of numerical goals or quota, or other types of affirmative action programs, with respect to transgender status, homosexuality or bisexuality in the administration of this policy.

Procedure

Any employee who feels that he or she is the victim of discrimination based on sexual orientation may file a written complaint with the Director of EEO or designee.

DISCRIMINATION COMPLAINT AGENCIES

An individual has the right to file his or her complaint of discrimination with any or all of the relevant agencies listed below. The individual can also simultaneously avail himself or herself of the Connecticut State Colleges and Universities (CSCU) Discrimination Complaint Procedure

1. The Connecticut Commission on Human Rights & Opportunities

Southwest Region Office

350 Fairfield Avenue
6th Floor
Bridgeport, CT 06604
Tel: (203) 579-6246
TDD (203) 579 – 6246

West Central Region Office

Rowland State Government Center
55 West Main Street, Suite 210
Waterbury, CT 06702-2004
Tel: (203) 805-6530
TDD (203) 805-6579

Capitol Region Office

450 Columbus Blvd
Hartford, CT 06103
Tel: (860) 566-7710
TDD (860) 566 – 7710

Eastern Region Office

100 Broadway
Norwich, CT 06360
Tel: (860) 886-5703
TDD (860) 886 - 5707

Complaints should be filed with the Commission on Human Rights and Opportunities (CHRO) no later than three hundred (300) days after the alleged act of employment discrimination occurred.

2. The Equal Employment Opportunities Commission

John F. Kennedy Federal Office Building
Government Center, Room 475
Boston, MA 02203
Tel: (617) 565-3200

Complaints should be filed with the Equal Employment Opportunities Commission (EEOC) no later than one hundred and eighty (180) days after the alleged act of employment discrimination occurred, except, that in a case when the aggrieved person has initially filed a complaint with the Commission on Human Rights and Opportunities, such complaint should be filed no later than three hundred (300) days after the alleged act of employment discrimination occurred. Alternatively:

3. Department of Education, Office of Civil Rights

United States Department of Education
Boston Office
8th Floor
5 Post Office Square
Boston, Massachusetts 02109-3921
Tel: (617) 289-0111

4. Department of Justice, for ADA complaints

United States Department of Justice
950 Pennsylvania Avenue, NW
Civil Rights Division
Disability Rights Section
Washington, D.C 20530
<https://www.ada.gov/complaint/>
This is the email to complete the required ADA complaint form.
To file ADA complaint by facsimile, send completed ADA complaint form to
Tel: (202)-307-1197

5. Connecticut Commission on Women, Children and Seniors, Equity & Opportunity

18-20 Trinity Street
Hartford, CT 06106
Tel: (860) 240-1424

6. State of Connecticut: Employee Grievance Procedure

(Contact Human Resources Office or union representatives for Grievance forms and/or procedures).
200 Folly Brook Boulevard
Wethersfield, CT 06109
Tel: (860) 566-3450

7. Wage and Hour and Public Contracts Division

United States Labor Department
135 High Street
Hartford, CT 06103
Tel: (860) 240-4277

8. Wage and Workplace Standards Division

Connecticut Department of Labor
200 Folly Brook Boulevard
Wethersfield, CT 06109
Tel: (860) 263-6790

Policy #	Policy Name	Reso #	Date Approved
4-13	Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy	BR 24-079	2024-07-31

NOTE: BOR Policies 4-11 and 5-02 have been rescinded and are being replaced with this new policy effective 7-31-2024.

INTERIM DISCRIMINATORY HARASSMENT, NONDISCRIMINATION, AND TITLE IX POLICY

1. Statement of Policy

The Connecticut State Colleges and Universities (“CSCU”) is committed to providing an educational and employment environment that is free from discrimination and/or harassment based on protected characteristics, and/or retaliation, including retaliation under applicable federal and state laws for engaging in protected activity.¹ To ensure compliance with federal, state, and local civil rights laws and regulations, and to affirm its commitment to promoting the goals of fairness and equity in all aspects of its education program or activity, CSCU has developed this Discriminatory Harassment, Nondiscrimination, and Title IX Policy (the “Policy”) that provides for a prompt, fair, and impartial resolution of allegations of protected characteristic discrimination, harassment, and/or allegations of retaliation. CSCU values and upholds the equal dignity of all members of its community and strives to balance the rights of all individuals when resolving allegations during what is often a difficult time for all involved.

2. Definitions

- **College or University.** Any of the institutions within CSCU, including Central Connecticut State University, Charter Oak State College, Connecticut State Community College, Eastern Connecticut State University, Southern Connecticut State University, and Western Connecticut State University.
- **Complainant.** A student or employee who is alleged to have been subjected to conduct that could constitute discrimination, harassment, and/or retaliation under this Policy; or a person other than a student or employee who is alleged to have been subjected to conduct that could constitute discrimination, harassment, and/or retaliation under this Policy and who was participating or attempting to participate in CSCU’s education program or activity at the time of the alleged discrimination, harassment and/or retaliation.

¹ This Policy does not cover whistleblower retaliation complaints. Reports concerning corruption, unethical practices, mismanagement, violation of State laws and regulations, gross waste of funds, abuse of authority or danger to the public safety in any in any College or University, may be submitted to the State Auditors of Public Accounts, as authorized under the Whistle Blower Act, Gen. Stat. 4-61dd. Individuals may file a whistleblower retaliation complaint by visiting the Auditors of Public Accounts [website](#).

- **Complaint.** An oral or written request to CSCU that can objectively be understood as a request for CSCU to investigate and make a determination about allegations of discrimination, harassment, and/or retaliation under this Policy.
- **CSCU.** The Connecticut State Colleges and Universities, which includes the CSCU system office, and any and all specific Colleges or Universities within the CSCU. For purposes of this Policy, the term “CSCU” could mean the CSCU system or any College or University interchangeably.
- **Education Programs and Activities.** Locations, events, or circumstances in which CSCU exercises substantial control over both the Respondent and the context in which the conduct occurred.
- **Informal Resolution.** A resolution to a Report or Complaint agreed to by the Parties and CSCU that occurs prior to a final determination in the Resolution Process.
- **Parties.** The Complainant(s) and Respondent(s), collectively.
- **Protected Characteristic.** Any characteristic for which a person is afforded protection against discrimination and/or harassment by law or CSCU Policy.
- **Report.** When a faculty, staff, student, or third party informs CSCU of conduct that reasonably may constitute discrimination, harassment, and/or retaliation under this Policy.
- **Resolution Process.** The investigation and resolution, including informal resolution, of allegations of discrimination, harassment, and/or retaliation under this Policy.
- **Respondent.** A person who is alleged to have engaged in conduct that could constitute discrimination, harassment, and/or retaliation for engaging in protected activity under this Policy.
- **Supportive Measures.** Non-disciplinary, non-punitive individualized services offered as appropriate and reasonably available. They are offered, without fee or charge to the Parties, to restore or preserve access to CSCU’s education program or activity, including measures designed to protect the safety of all Parties and/or the CSCU educational environment and/or to deter discrimination, harassment, and/or retaliation.
- **Title IX/Equity Coordinator.** At least one official designated by a College or University to ensure compliance with Title IX and other federal and state civil rights laws and institutional compliance with this Policy. References to the Title IX/Equity Coordinator throughout this Policy may include the Title IX/Equity Coordinator’s designee.

3. Notice of Nondiscrimination

CSCU complies with all federal, state, and local laws, regulations, and ordinances prohibiting discrimination, harassment, and/or retaliation, including retaliation for engaging in protected activity, in public post-secondary education institutions. CSCU does not discriminate against any employee, applicant for employment, student, or applicant for admission on the basis of actual

or perceived age, ancestry, color, gender expression, gender identity, genetic information and/or family medical history, intellectual disability, learning disability, parental, family or marital status, past or present history of mental disability, physical disability, pregnancy or related conditions, race or national origin, religion or creed, sex, sexual orientation, veteran or military status, arrest and/or criminal conviction status, lawful source of income, citizenship or immigration status, or any other protected characteristic under applicable local, state, or federal law, including protections for those opposing discrimination or participating in any grievance process within the institution, with the Equal Employment Opportunity Commission and/or the Connecticut Commission on Human Rights and Opportunities (“CHRO”).

This Policy prohibits discrimination, harassment, and/or retaliation in access to employment and/or educational opportunities. Therefore, any act by CSCU or a member of the CSCU community that denies, deprives, unreasonably interferes with or limits a person’s education or employment, residential, and/or social access, benefits, and/or opportunity based upon that person’s actual or perceived protected characteristic(s), is in violation of this Policy. CSCU will promptly and effectively address any such discrimination, harassment, and/or retaliation when it has knowledge and/or notice of it using procedures promulgated pursuant to this Policy.

4. Key CSCU Contacts

CSCU has identified the Executive Director of EEO and Civil Rights/Title IX Coordinator to coordinate the System’s compliance with federal, state, and other civil rights laws and policies.

Each College or University has identified a Title IX/Equity Coordinator to coordinate civil rights compliance and the Resolution Process.² The Vice-President of Diversity, Equity and Inclusion serves as the Title IX/Equity Coordinator for Connecticut State Community College (“CCSC”). Each CSCC campus has a Deputy Title IX/Equity Coordinator to support civil rights compliance and programming for their institution.

Collectively, these individuals are responsible for providing comprehensive nondiscrimination education and training; coordinating a timely, thorough, and fair Resolution Process of all alleged prohibited conduct under this Policy; and monitoring the effectiveness of this Policy and related procedures to ensure that CSCU’s education and employment environments are free from discrimination, harassment, and/or retaliation.

² Note that individuals who serve as Title IX/Equity Coordinator for the institutions may have additional job titles and functions, as well. Although other staff from institutions may support related procedures under this Policy, all faculty and staff are always encouraged to coordinate efforts with their institution’s Title IX/Equity Coordinator.

5. Applicability and Jurisdiction

This Policy applies to all faculty, staff, employees, students (as currently defined in the BOR/CSCU Student Code of Conduct),³ and other individuals participating in or attempting to participate in the CSCU's education programs and activities, including but not limited to contractors, vendors, visitors, guests, or other third parties. This Policy may be applied to incidents, patterns or practices, and/or institutional culture/climate, all of which may be addressed in accordance with this Policy. This Policy applies to the CSCU's education programs and activities, circumstances where CSCU has disciplinary authority, and to misconduct occurring within any building owned or controlled by an officially recognized student organization (as defined in the BOR/CSCU Student Code of Conduct).

This Policy shall apply on and off CSCU campus property, at CSCU-sponsored activities, and at activities conducted by officially recognized student organizations. This also applies to conduct that occurs online and through other forms of electronic communication and social media. CSCU is more likely to exercise jurisdiction off-campus if the conduct poses a threat to anyone's health, safety, or security, could negatively affect the mission or reputation of CSCU, poses a threat of undermining CSCU's educational process, involves an alleged violation of local, state or federal law, or if CSCU is required to do so by law.

This Policy applies to alleged incidents of discrimination, harassment, sex-based harassment, and/or retaliation that occur after August 1, 2024. For alleged incidents of sexual misconduct occurring prior to August 1, 2024, CSCU shall apply the policies promulgated by the Board of Regents at the time the alleged incident occurred, and procedures promulgated pursuant to those policies. All policies and procedures may be obtained by contacting the Executive Director of EEO and Civil Rights/Title IX Coordinator.

For disciplinary action to be issued under this Policy, the Respondent must be a CSCU faculty member, staff, or student subject to CSCU's disciplinary authority. If the Respondent is unknown or is not a member of CSCU, the Title IX/Equity Coordinator will offer to assist the Complainant in identifying appropriate campus and local resources and support options and will implement appropriate supportive measures and/or remedial actions (e.g., trespassing a person from campus). The Title IX/Equity Coordinator can also assist in contacting local or campus law enforcement if the Complainant would like to file a police report about criminal conduct.

³ Under the BOR/CSCU Student Code of Conduct at the time of the adoption of this Policy: "Student" means any person who has been notified of their acceptance for admission, registered, enrolled, or attending any College or University course or program. This applies whether enrollment is full-time or part-time; whether the course(s) occur on-campus, online, or at an off-campus instructional site (domestically, or internationally such as students studying abroad); and whether the student is pursuing undergraduate, graduate, non-degree seeking, post-graduate, or professional studies. This may also apply to any person who resides in a College or University residence hall. Persons who withdraw or otherwise depart a College or University after allegedly violating the Student Code are still considered students for the purpose of resolution through this Student Code. For the purposes of applying this Student Code, the Chief Student Conduct Officer, or designee, may use discretion in determining if the person's "student" designation and will have the authority to make any final determination as to whether or not a person is a "student." Generally, a student is not considered to have a continuing relationship if a student has not been enrolled in classes at a College or University for three (3) or more consecutive terms.

When a Respondent is enrolled in or employed by another institution, the Title IX/Equity Coordinator may assist the Complainant in contacting the appropriate individual at that institution, as it may be possible for the Complainant to pursue action under that institution's policies.

Similarly, the Title IX/Equity Coordinator may be able to assist and support a student, faculty, or staff Complainant who experiences discrimination, harassment, and/or retaliation in an externship, study abroad program, or other environment external to CSCU where harassment and/or nondiscrimination policies and procedures of the facilitating or host organization may give the Complainant recourse. If there are effects of that external conduct that impact a CSCU faculty, staff, or student's work or educational environment, those effects may be addressed remedially by the Title IX/Equity Coordinator, if brought to their attention.

6. Prohibited Conduct

CSCU faculty, staff, and students are entitled to an employment and educational environment that is free of discrimination, harassment, and/or retaliation. This Policy is not meant to inhibit or prohibit educational content or discussions inside or outside of the classroom that include germane, but controversial or sensitive subject matters protected by the First Amendment or principles of academic freedom. When speech or conduct may be protected by the First Amendment and/or academic freedom, including speech in a public setting and/or speech that is also motivated by political or religious belief, CSCU may nevertheless have an obligation to respond and offer supportive measures for those impacted.

CSCU may communicate its opposition to stereotypical, derogatory opinions; provide counseling and support for students affected by such harassment; or take steps to establish a welcoming and respectful campus environment, which could include making clear that CSCU values the diversity and inclusion of individuals of all backgrounds across the entire CSCU system.

All definitions of prohibited conduct below encompass actual and/or attempted offenses. Violation of any other CSCU policies may constitute discrimination or harassment when motivated by actual or perceived protected characteristic(s), and the result is a limitation or denial of employment or educational access, benefits, or opportunities.

- A. **Discrimination** is different treatment with respect to an individual's employment or participation in an education program or activity based, in whole or in part, upon the individual's actual or perceived protected characteristic. Discrimination also includes allegations of a failure to provide reasonable accommodations as required by law or policy, such as for disability, religion, or creed. Discrimination can take two primary forms:
 - **Disparate Treatment Discrimination:** Any intentional differential treatment of a person or persons that is based on an individual's actual or perceived protected characteristic and that excludes an individual from participation in;

denies the individual benefits of; or otherwise adversely affects a term or condition of an individual's participation in a CSCU program or activity.

- **Disparate Impact Discrimination:** Disparate impact occurs when policies or practices that appear to be neutral unintentionally result in a disproportionate impact on a protected group or person that excludes an individual from participation in; denies the individual benefits of; or otherwise adversely affects a term or condition of an individual's participation in a CSCU program or activity.
- B. **Discriminatory Harassment** is unwelcome conduct based on actual or perceived protected characteristic(s), that based on the totality of the circumstances, is subjectively and objectively offensive, and is so severe, persistent, or pervasive, that it limits or denies a person's ability to participate in or benefit from a CSCU program or activity.
- C. **Sex-based Harassment** is a form of sex discrimination and means sexual harassment and other harassment based on sex,⁴ including sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity; sexual assault, dating violence, domestic violence, and stalking.
- **Quid pro quo:** an employee agent, or other person authorized by CSCU, to provide an aid, benefit, or service under a CSCU program or activity, explicitly or impliedly conditioning the provision of such aid, benefit, or service, on a person's participation in unwelcome sexual conduct.
 - **Hostile Environment Harassment:** unwelcome sex-based conduct, that based on the totality of the circumstances, is subjectively and objectively offensive, and is so severe or pervasive, that it limits or denies a person's ability to participate in or benefit from the CSCU's education program or activity.
 - **Sexual Assault:** Any sexual act, including Rape, Sodomy, Sexual Assault with an Object, or Fondling directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent; also, unlawful sexual intercourse.

⁴ Throughout this Policy, "based on sex" means conduct that is sexual in nature, or that is directed to the Complainant because of his/her/their actual or perceived sex or gender identity.

- a. **Rape:** Penetration, without the consent of the Complainant, including instances where the Complainant is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity.
 - b. **Sodomy:** Oral or anal penetration, of the Complainant by the Respondent, without the consent of the Complainant, including instances where the Complainant is incapable of giving consent because of their age or, because of their temporary or permanent mental or physical incapacity.
 - c. **Sexual Assault with an Object:** Respondent's use of an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of the Complainant, without the consent of the Complainant, including instances where the Complainant is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity.
 - d. **Fondling:** The touching of the private body parts (breasts, buttocks, groin) of the Complainant by the Respondent or causing the Complainant to touch the Respondent's private body parts intentionally for a sexual purpose without the consent of the Complainant, including instances where the Complainant is incapable of giving consent because of their age or because of their temporary or permanent mental incapacity or physical incapacity.
 - e. **Incest:** Nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by Connecticut law.
 - f. **Statutory Rape:** Nonforcible sexual intercourse with a person who is under the statutory age of consent in Connecticut.
- D. **Dating Violence:** Violence⁵ committed by a Respondent, who is in or has been in a social relationship of a romantic or intimate nature with the Complainant; and where the existence of such a relationship shall be determined based on a consideration of the following factors: length of the relationship, type of relationship, and/or frequency of the interaction between the Parties involved in the relationship.

⁵ For purposes of this Policy, violence is defined as intentionally or recklessly causing the Complainant physical, emotional, or psychological harm. Legitimate use of violence for self-defense is not chargeable under this Policy because the purpose is safety, not harm. Consensual use of violence, such as in kink relationships, would also not meet this definition, in most circumstances.

- E. **Domestic Violence:** Felony or misdemeanor crimes committed by a person who: is a current or former spouse or intimate partner of the Complainant under the family or domestic violence laws of Connecticut, or a person similarly situated to a spouse of the Complainant; is cohabitating with, or has cohabitated with, the Complainant as a spouse or intimate partner; shares a child in common with the Complainant; or commits acts against a youth or adult Complainant who is protected from those acts under the family or domestic violence laws of Connecticut.
- F. **Stalking:** engaging in a course of conduct⁶ based on sex, that is directed at the Complainant that would cause a reasonable person to fear for the person's safety, or the safety of others; or suffer substantial emotional distress.
- G. **Sexual exploitation**⁷ occurs when the Respondent takes non-consensual or abusive sexual advantage of another for anyone's advantage or benefit other than the person being exploited, and that behavior does not otherwise constitute one of the preceding offenses. Examples of behavior that could rise to the level of sexual exploitation include, but are not limited to:
- Sexual voyeurism (such as observing or allowing others to observe a person undressing or using the bathroom or engaging in sexual acts, without the consent of the person being observed)
 - Knowingly making an unwelcome disclosure of (or threatening to disclose) an individual's sexual orientation, gender identity, or gender expression
 - Taking pictures, video, or audio recording of another in a sexual act, or in any other sexually related activity when there is a reasonable expectation of privacy during the activity, without the consent of all involved in the activity; or exceeding the boundaries of consent (such as allowing another person to hide in a closet and observe sexual activity, or disseminating sexual pictures without the photographed person's consent), including the making or posting of non-consensual pornography
 - Prostituting another person
 - Engaging in sexual activity with another person while knowingly infected with human immunodeficiency virus (HIV) or a sexually transmitted disease (STD) or infection (STI), without informing the other person of the virus, disease, or infection

⁶ For purposes of this definition, "A 'course of conduct' requires that there be more than one incident and the conduct must be directed at a specific person. Stalking can occur in person or using technology, and the duration, frequency, and intensity of the conduct should be considered. Stalking tactics can include, but are not limited to watching, following, using tracking devices, monitoring online activity, unwanted contact, property invasion or damage, hacking accounts, threats, violence, sabotage, and attacks. Merely annoying conduct, even if repeated, is a nuisance, but is not typically considered to be stalking.

⁷ Sexual exploitation is further defined as a crime in Connecticut State Law.

- Causing or attempting to cause the incapacitation of another person (through alcohol, drugs, or any other means) for the purpose of compromising that person's ability to give consent to sexual activity, or for the purpose of making that person vulnerable to non-consensual sexual activity
- Misappropriation of another person's identity on apps, websites, or other venues designed for dating or sexual connections (e.g., spoofing)
- Forcing a person to take an action against that person's will by threatening to show, post, or share information, video, audio, or an image that depicts the person's nudity or sexual activity
- Knowingly soliciting a minor for sexual activity
- Engaging in sex trafficking
- Knowingly creating, possessing, or disseminating child sexual abuse images or recordings
- Creating or disseminating synthetic media, including images, videos, or audio representations of individuals doing or saying sexually-related things that never happened, or placing identifiable real people in fictitious pornographic or nude situations without their consent (i.e., Deepfakes)
- Creating or disseminating images or videos of child sexual abuse material

H. Retaliation: Adverse action, including intimidation, threats, coercion, or discrimination, against any person, by the CSCU, any student, employee, or a person authorized by CSCU to provide aid, benefit, or service under CSCU's education programs or activities, for the purpose of interfering with any right or privilege secured by law or Policy, or because the person has engaged in protected activity, including reporting information, making a Complaint, testifying, assisting, or participating or refusing to participate in any manner in an investigation or Resolution Process pursuant to this Policy, including an informal resolution, or in any other appropriate steps taken by CSCU to promptly and effectively end any discrimination, harassment, and/or retaliation in its education programs or activities, prevent its recurrence, and/or remedy its effects.

I. Unauthorized Disclosure:⁸ Distributing or otherwise publicizing materials created or produced during an investigation or Resolution Process except as required by law or as expressly permitted by CSCU; or publicly disclosing a party's personally identifiable information without authorization or consent.

⁸ Nothing in this section restricts the ability of the Parties to: obtain and present evidence, including by speaking to witnesses (as long as it does not constitute retaliation under this Policy), consult with their family members, confidential resources, or Advisors; or otherwise prepare for or participate in the Resolution Process.

As used in this Policy, the following definition (and concepts) apply:

Consent is an understandable exchange of affirmative and clear words or actions, which indicate a willingness to voluntarily participate in mutually agreed upon sexual activity. Consent must be informed, freely and actively given. It is the responsibility of the initiator to obtain clear and affirmative responses at each stage of sexual involvement. Consent to one form of sexual activity does not imply consent to other forms of sexual activity. The lack of a negative response is not consent. An individual who is incapacitated by alcohol and/or other drugs both voluntarily or involuntarily consumed may not give consent. Past consent to sexual activity does not imply ongoing future consent. Consent can also be withdrawn once given, if the withdrawal is reasonably and clearly communicated. If consent is withdrawn, sexual activity should cease within a reasonably immediate time.

Consent cannot be given if any of the following are present: Force, Coercion, or Incapacitation.

- A. **Force** is the use of physical violence and/or imposing on someone physically to gain sexual access. Force also includes threats, intimidation (implied threats), and/or coercion that overcome resistance.
- B. **Coercion** is unreasonable pressure for sexual activity. Coercion is more than an effort to persuade, entice, or attract another person to have sex. Conduct does not constitute coercion unless it wrongfully impairs an individual's freedom of will to choose whether to participate in sexual activity.
- C. **Incapacitation** is a state where an individual cannot make rational, reasonable decisions due to the debilitating use of alcohol and/or other drugs, sleep, unconsciousness, or because of a disability that prevents the individual from having the capacity to give consent. Intoxication is not incapacitation and a person is not incapacitated merely because the person has been drinking or using drugs. Incapacitation due to alcohol and/or drug consumption results from ingestion that is more severe than impairment, being under the influence, drunkenness, or intoxication. The question of incapacitation will be determined on a case-by-case basis. Being intoxicated or incapacitated by drugs, alcohol, or other medication will not be a defense to any violation of this Policy.

7. Reports/Complaints of Discrimination, Harassment and/or Retaliation

A Report provides notice to CSCU of an allegation or concern about discrimination, harassment, and/or retaliation and provides an opportunity for the Title IX/Equity Coordinator to provide

information, resources, and supportive measures. A Complaint provides notice to CSCU that the Complainant would like to initiate an investigation or other appropriate resolution procedures. An individual may initially make a Report and may decide at a later time to make a Complaint. Reporting options are detailed in procedures promulgated pursuant to this Policy; however, Reports or Complaints of discrimination, harassment, and/or retaliation may be made by making a verbal or written Report or Complaint to the Title IX/Equity Coordinator.

Reporting carries no obligation to initiate a Complaint, and in most situations, CSCU may be able to respect a Complainant's request to not initiate the Resolution Process. However, there may be circumstances, such as pattern behavior, allegations of severe misconduct, or a compelling threat to health and/or safety, where CSCU may need to initiate the Resolution Process.

8. Mandated Reporting and Confidential Employees

All CSCU employees (including student-employees), other than those deemed Confidential Employees below, are Mandated Reporters and are expected to promptly report all known details of actual or suspected discrimination, harassment, and/or retaliation to the Title IX/Equity Coordinator immediately.

Complainants and other individuals should consider whether they share personally identifiable details with Mandated Reporters, as those details must be shared with the Title IX/Equity Coordinator. A Complainant who desires formal action in response to their allegations may report to any Mandated Reporter, who can connect them with resources to report alleged crimes and/or Policy violations, and Mandated Reporters will immediately notify the Title IX/Equity Coordinator (and/or police, if desired by the individual or required by law), who will act when an incident is reported to them.

CSCU makes every effort to preserve the Parties' privacy. Information related to a Report or Complaint will be shared with a limited number of CSCU employees who "need to know" in order to assist in providing supportive measures or evaluating, investigating, or resolving a Report or Complaint. All employees who are involved in the CSCU's procedures under this Policy receive specific training and guidance about sharing and safeguarding private information in accordance with federal and state law. CSCU will not share the identity of any individual who has made a Report or Complaint; any Complainant; any individual who has been reported to be the perpetrator of discrimination, harassment, and/or retaliation; any Respondent; or any witness, except as permitted by, or to fulfill the purposes, of applicable laws and regulations (e.g., Title IX), Family Educational Rights and Privacy Act (FERPA) and its implementing regulations, or as required by law; including any investigation, or resolution proceeding arising under this Policy.

Confidential Employees.⁹ To enable individuals to access support and resources without filing a Complaint, CSCU has designated specific employees as Confidential Employees. Those designated by CSCU as Confidential Employees for purposes of this Policy are not required to

report actual or suspected discrimination, harassment, and/or retaliation in a way that identifies the reporting individual. They will, however, provide individuals with the Title IX/Equity Coordinator's contact information and offer options and resources without any obligation to inform an outside agency or the Title IX/Equity Coordinator unless an individual has requested the information be shared.

⁹ The term "confidential" as used in this Policy differs from the use of the term "management/confidential" typically used to describe a category of employees within CSCU.

There are three categories of Confidential Employees: 1) Those with confidentiality bestowed by law or professional ethics, such as lawyers, medical professionals, clergy, and counselors; 2) Those whom CSCU has specifically designated as confidential for purposes of providing support and resources to the individual; and 3) Those conducting human subjects research as part of a study approved by an Institutional Review Board (IRB). For those in category 1), above, to be able to respect confidentiality, they must be in a confidential relationship with reporting individual, such that they are within the scope of their licensure, professional ethics, or confidential role at the time of receiving the report. These individuals will maintain confidentiality except in extreme cases of health or safety emergencies, immediacy of threat or danger or abuse of a minor, elder, or individual with a disability, or when required to disclose by law or court order.¹⁰

If a Complainant would like the details of an incident to be kept confidential, they may speak with the following Confidential Employees:

- Campus-based counseling center staff
- Campus-based health center staff
- Any clergy affiliated with a College or University
- Ombudspersons
- On-campus victim advocates
- Sports medicine staff/Athletic trainers

In addition, a Complainant may speak with individuals unaffiliated with CSCU without concern that Policy will require them to disclose information to the CSCU without permission such as: licensed professional counselors and other medical providers, local rape crisis counselors, domestic violence resources, local or state assistance agencies, clergy/chaplains, attorneys.

9. Supportive Measures

The Title IX/Equity Coordinator will offer and implement appropriate and reasonable supportive measures to individuals in response to reports of alleged discrimination, harassment, and/or retaliation. Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate and reasonably available. They are offered, without fee or charge to the

Parties, to restore or preserve access to CSCU's education program or activity, including measures designed to protect the safety of all individuals and/or the educational environment and/or to deter discrimination, harassment, and/or retaliation.

¹⁰ All employees must always comply with BOR Policy 5.6, Reporting Suspected Abuse or Neglect of a Child, as applicable.

10. Standard of Proof

CSCU uses the preponderance of the evidence standard of proof when determining whether this Policy has been violated. This means that the CSCU will decide whether it is more likely than not based upon the available information at the time of the decision, that an individual is in violation of this Policy.

11. Time Limits on Reporting

There is no time limitation on providing Reports or Complaints to a Title IX/Equity Coordinator. However, if an individual is no longer subject to the CSCU's jurisdiction and/or significant time has passed, the ability to investigate, respond, and/or provide remedies may be more limited or impossible. Acting on Reports or Complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of Policy) is at CSCU's discretion; they may document allegations for future reference, offer supportive measures and/or remedies, and/or engage in informal or formal action, as appropriate.

12. Bias and Conflicts of Interest

Title IX/Equity Coordinators are expected to act without bias and conflicts of interest. Title IX/Equity Coordinators are trained to ensure they are not biased for or against any individual in a specific Complaint, or for or against Complainants and/or Respondents, generally.

To raise any concern involving bias, conflict of interest, misconduct, or discrimination by a Title IX/Equity Coordinator, contact the Executive Director of EEO and Civil Rights/Title IX Coordinator. Concerns of bias, conflict of interest, misconduct, or discrimination by other individuals involved in administering this Policy should be raised with the Title IX/Equity Coordinator.

13. External Agency Contact Information

Concerns about the CSCU's application of this Policy and compliance with federal or state civil rights laws may also be addressed to the agencies below. Making a Report or Complaint under this Policy has no bearing on reporting to an external enforcement agency. Individuals may concurrently make reports to law enforcement, external enforcement agencies, and any other entity as appropriate to their circumstances.

Contact information for state and federal agencies where one can report discrimination, harassment, retaliation and/or sexual misconduct in the workplace or educational environment are provided below. Individuals should contact these agencies directly for information on the respective reporting process, reporting timelines, and other matters.

United States Equal Employment Opportunity Commission (EEOC)

John F. Kennedy Federal Office Building
Government Center, Room 475
Boston, MA 02203
(617) 565-3200

United States Department of Education, Office for Civil Rights (OCR)

400 Maryland Avenue, SW
Washington, D.C. 20202-1100
(800) 421-3481
Facsimile: (202) 453-6012
TDD#: (877) 521-2172
Email: OCR@ed.gov
Web: <http://www.ed.gov/ocr>

United States Department of Education, Office for Civil Rights (OCR) (Boston office)

33 Arch Street, Ninth Floor
Boston, MA 02110
(617) 289-0111

United States Department of Justice, Civil Rights Division

950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001
(202) 514-3847 or (855) 856-1247
(TTY) (202) 514-0716

Offices of the Connecticut Commission on Human Rights and Opportunities

450 Columbus Boulevard, Suite 2, Hartford, CT 06103; (860) 566-7710
100 Broadway, Norwich, CT 06360; (860) 886-5703
55 W. Main Street, Suite 210, Waterbury, CT 06702; (203) 805-6530
350 Fairfield Avenue, 6th Floor, Bridgeport, CT 06604; (203) 579-6246

Connecticut Commission on Women, Children and Seniors, Equity & Opportunity

18-20 Trinity Street
Hartford, CT 06106
(860) 240-1424

State of Connecticut: Employee Grievance Procedure

(contact the College or University Human Resources Office or union representative for
Grievance forms and/or procedures)
200 Folly Brook Boulevard
Wethersfield, CT 06109
(860) 566-3450

14. Revision of this Policy

This Policy succeeds previous policies addressing discrimination, harassment, sexual misconduct, including Statement of Title IX Policy effective 7/29/2020, and/or retaliation, though previous policies and procedures related to sexual misconduct, including the Statement of Title IX Policy, remain in force for incidents occurring before August 1, 2024. The Executive Director of EEO and Civil Rights/Title IX Coordinator is responsible for periodic review and updates to this Policy, in consultation with the Office of General Counsel and other relevant CSCU stakeholders. The BOR reserves the right to revise this Policy as necessary.

This Policy is effective July 31, 2024.

DISCRIMINATION COMPLAINT LOG

AGENCY: Charter Oak State College

REPORTING DATE: November 30, 2024

NUMBER	COMPLAINANT RACE/SEX	DATE FILED	TYPE*	ACCUSED**	BASIS CLAIMED	FINDING	RESOLUTION	LENGTH OF TIME TO RESOLVE
1	WF	12/22	Internal	COSC Staff	Sex Discrimination	Unsubstantiated	N/A	23 days
2	BM	12/23	External CHRO/ EEOC	COSC Staff	Sex Discrimination	Pending	N/A	Pending
3								
4								
5								
6								
7								
8								

*Internal (within Agency) or External (CHRO, DOL, EEOC, etc.)

**Co-worker, Supervisor, Manager, etc.

Section 46a-68-90

Goals Analysis

Section 46a-68-90 - GOALS ANALYSIS
December 1, 2022 – November 30, 2024

Hiring Goals Analysis

Executive

- Goals: 3 WF, 1 BM, 1 BF, 1 HM, 1 AAIANHNPI
- Hires: 1 WF, 1 BF, 1WM
- Goal Achievement: Two (2) out of three (3) of the hires in this category met affirmative action goals (67% achievement).

1. Bachelor of Social Work Program Director (1BF)

Applicant pool summary (bolded = goal candidates)

	Total			White		Black		Hispanic		AAIANHNPI		Two or More		Unknown		
	Total	M	F	M	F	M	F	M	F	M	F	M	F	M	F	U
Total Applicants	29	5	23	1	11	2	7	1	3	1					2	1
Not Qualified	23	4	18	1	10	1	6	1	1	1					1	1
Total Qualified	6	1	5		1	1	1		2						1	
Qual No Interview	1	1	0			1										
Qual Rec Interview	5	0	5		1		1		2						1	
Withdrew	1	0	1						1							
Interviewed	4	0	4		1		1		1						1	
Offered	1	0	1				1									
Not Accepted	0	0	0				0									
Hired	1	0	1				1									

Charter Oak State College achieved a goal with the hire of this Black female.

2. Director, RN/ADN to BSW Program (1WF)

Applicant pool summary (bolded = goal candidates)

	Total			White		Black		Hispanic		AAIANHNPI		Two or More		Unknown		
	Total	M	F	M	F	M	F	M	F	M	F	M	F	M	F	U
Total Applicants	15	3	10		7	1	1	2							2	2
Not Qualified	7	1	4		1		1	1							2	2
Total Qualified	8	2	6		6	1		1								
Qual No Interview	1	0	1		1											
Qual Rec Interview	7	2	5		5	1		1								
Withdrew	2	0	2		2											
Interviewed	5	2	3		3	1		1								
Offered	1	0	1		1											
Not Accepted	0	0	0													
Hired	1	0	1		1											

Charter Oak State College achieved a goal with the hire of this White female.

Section 46a-68-90 – GOALS ANALYSIS - Page 1

Key: W=White, B=Black, H=Hispanic, A=(Asian, American Indian, Alaskan Native, Hawaiian, Pacific Islander),
U=Unknown, T=two or more races, F=Female, M=Male

Section 46a-68-90 - GOALS ANALYSIS
December 1, 2022 – November 30, 2024

3. Network Operations Director (1WM)

Position Summary: The Network Operations Director is responsible for the data center technology infrastructure including resource management, status reports, security policy enforcement, and staff development; recommends, develops and, with the data center staff, maintains server-based technologies; performs systems maintenance and deployment to support the COSC's high-availability environment. The position supervises Network Administrator(s), student workers, and contractors as assigned.

This position was posted on the following sites: Higheredjobs.com, DiverseEducation.com, DiversityTrio, LinkedIn, Glassdoor, Indeed.com, ZipRecruiter, Adzuna, neuvoo, Jobcase.com, Job.net, Sercanto, Careerjet, Oodle, ct.edu, and sent to the CSCU email system distribution list.

Minimum qualifications: Master's degree or bachelor's degree in MIS or Computer Science with technical and security certifications. A minimum of five (5) years of experience in developing and managing network technologies and systems administration; experience with fundamental computing and networking methodologies, technologies, and storage including Windows, VMWare, VDI, Linux; experience supervising staff; and experience building a team.

Incumbents must possess proven ability to effectively work with a culturally, linguistically, and ethnically diverse faculty, staff, and students. They are expected to have excellent oral and written communication skills along with strong Information technology literacy skills such as Microsoft Office (Word, Excel, Outlook, Teams etc.)

Preferred qualifications: Experience with cloud-based backup services and experience with Active Directory administration.

Substitutions Allowed: Applicants who do not meet the minimum qualifications as stated are encouraged to put in writing precisely how their background and experience have prepared them for the responsibilities of this position and by providing appropriate references. Exceptions to the degree requirements may be made for compelling reasons.

Applicant pool summary (bolded = goal candidates)

	Total			White		Black		Hispanic		AAIANHNPI		Two or More		Unknown		
	Total	M	F	M	F	M	F	M	F	M	F	M	F	M	F	U
Total Applicants	7	6	1	4	1					1				1		
Not Qualified	2	2	0	1										1		
Total Qualified	5	4	1	3	1					1						
Qual No Interview	0	0	0													
Qual Rec Interview	5	4	1	3	1					1						
Withdrew	1	1	0	1												
Interviewed	4	3	1	2	1					1						
Offered	1	1	0	1												
Not Accepted																
Hired	1	1	0	1												

Section 46a-68-90 – GOALS ANALYSIS - Page 2

Key: W=White, B=Black, H=Hispanic, A=(Asian, American Indian, Alaskan Native, Hawaiian, Pacific Islander),
U=Unknown, T=two or more races, F=Female, M=Male

Section 46a-68-90 - GOALS ANALYSIS
December 1, 2022 – November 30, 2024

Charter Oak State College received seven (7) applications for this position, including one (1) WF candidate and one (1) AM. The college interviewed five (5) candidates, including the two (2) goal candidates. The disposition for the goal candidates is as follows:

- 1WF did not provide details or information about her direct supervisory experience and did not include her direct experience building teams during her interview.
- 1 AM who was interviewed did not provide a detailed response regarding network configurations on a microlevel. The candidate also did not answer direct questions pertaining to network configuration settings. Based on the individual's responses during the interview, it was determined that the candidate did not possess the ability to manage the technical aspects of the position as outlined in the job description.

Charter Oak State College did not achieve a goal with the hire of one (1) White male who possessed a bachelor's degree, Microsoft Certified Systems Engineer certification, and over 23 years of experience working in active directory administration. The selected candidate had experience leading a team responsible for a district wide network, spanning multiple locations. In addition to Active Directory proficiency, the candidate possessed proficiency in Windows Server, Linux Server, Hyper-V / VMWare Virtual Hosts, Google GSuite; Client management and deployment; Solarwinds Helpdesk; HPE/Aruba networking; Cisco-Meraki Wifi; Cisco Duo MFA. The candidate also provided detailed examples of network configurations and improvements implemented while ensuring adherence to security protocols.

Professional/Non-Faculty

- Goals: 1 HM, 2 AAIANHNPIF
- Hires: 1 WM, 3 WF, 1 BM, 2 BF, 1 HF
- Goal Achievement: Zero (0) out of eight (8) for 0% of the hires in this category met affirmative action goals.

1. Assistant Director of Academic Services (1BM)

Position Summary: The Assistant Director of Academic Counseling (AD) represents the Office of Academic Counseling and serves on the office's leadership team. The AD oversees the day-to-day operations for student academic advising, institutional retention efforts, maintains a reduced advising workload specializing in special programs and at-risk populations, and works closely with the Registrar's Office and Information Technology to manage the department's integrated information systems.

This position was posted on the following sites: HigherEdJobs.com, DiverseEducation.com, DiversityTrio, LinkedIn, Glassdoor, Indeed.com, ZipRecruiter, Adzuna, neuvo, Jobcase.com, Job.net, Sercanto, Careerjet, Oodle, ct.edu, and sent through the CSCU email system distribution list.

Minimum qualifications: Master's degree and a minimum of three (3) years of relevant experience in higher education; Ability to build a team and lead in a positive direction with a focus on providing

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Key: W=White, B=Black, H=Hispanic, A=(Asian, American Indian, Alaskan Native, Hawaiian, Pacific Islander),
U=Unknown, T=two or more races, F=Female, M=Male

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excellent service to students; ability to comprehend and analyze data, create reports, and presentations, suggest recommendations and make data-informed decisions; excellent customer service and interpersonal skills; demonstrate ability to manage multiple, competing priorities and to prioritize projects in a fast-paced environment with strong attention to critical details. Ability to adapt to constant change. Ability to maintain the standards of confidentiality as established by the profession.

Incumbents must possess proven ability to effectively work with a culturally, linguistically, and ethnically diverse faculty, staff, and students. They are expected to have excellent oral and written communication skills along with strong Information technology literacy skills such as Microsoft Office (Word, Excel, Outlook, Teams etc.)

Substitutions Allowed: Applicants who do not meet the minimum qualifications as stated are encouraged to put in writing precisely how their background and experience have prepared them for the responsibilities of this position and by providing appropriate references. Exceptions to the degree requirements may be made for compelling reasons.

Preferred qualifications: Strong knowledge of integration software background. A master's degree in counseling, higher education, student affairs, as well as experience with student information systems software and data reporting tools (i.e. PowerBI, etc.) and experience working with online and/or adult learners are also preferred.

Applicant pool summary (bolded = goal candidates)

	Total			White		Black		Hispanic		AAIANHNPI		Two or More		UNKNOWN		
	Total	M	F	M	F	M	F	M	F	M	F	M	F	M	F	U
Total Applicants	46	12	34	5	15	2	7	4	3		1		2	1	6	
Not Qualified	37	7	30	4	12		7	2	2		1		2	1	6	
Total Qualified	9	5	4	1	3	2		2	1							
Qual No Interview	0	0	0													
Qual Rec Interview	9	5	4	1	3	2		2	1							
Withdrew	1	1	0			1										
Interviewed	8	4	4	1	3	1		2	1							
Offered	1	1	0			1										
Not Accepted	0	0	0													
Hired	1	1	0			1										

Charter Oak State College received forty-six (46) applications for this position. Of the applications received, there were four (4) HM and one (1) AF. Two (2) HMs and one (1) AF did not possess the required three (3) years of relevant experience in higher education, nor did they possess experience analyzing data and creating reports to make data-informed decisions.

Nine (9) candidates were deemed qualified for the position and were invited for interviews, including two (2) HM goal candidates. One (1) HM candidate did not address the steps to de-escalate a customer service scenario. The response did not demonstrate the applicant's understanding of the chain of command, problem resolution and de-escalation. Further, the candidate did not provide any concrete examples of initiatives to increase retention. Another HM

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was also interviewed, however, the candidate's responses indicated he was not familiar with working with adult learners and lacked experience in an online environment.

Charter Oak did not achieve a goal with the hire of one 1BM who possessed over twenty (20) years of experience in higher education. The candidate had experience working with adult learners and in an online environment. The candidate shared initiatives to improve student retention rates and demonstrated an understanding of using data points for reporting. The candidate also provided a response that demonstrated their ability to address the needs of students from diverse backgrounds.

2. Enrollment Services Associate (Professional/Non-Faculty) (1WF)

Position Summary: The Enrollment Services Associate uses positive and persuasive communication skills to interact with prospective students at various stages in the recruitment and enrollment process with the intent of enrolling students that match the Charter Oak State College profile; disseminates program and course information to prospective students, promotes the advantages of the College's online course offerings and uses multi-channel communications including phone, text, email and chat to engage prospective students. Some evening hours required.

This position was posted on the following sites: Higheredjobs.com, DiverseEducation.com, DiversityTrio, LinkedIn, Glassdoor, Indeed.com, ZipRecruiter, Adzuna, neuvo, Jobcase.com, Job.net, Sercanto, Careerjet, Oodle, ct.edu, and sent to the CSCU email system distribution list.

Minimum qualifications: Associate's degree, a minimum of two (2) years relevant experience; experience in creating appropriate written messages for email, text and chat formats; experience working independently and in a team environment and manage multiple tasks efficiently and effectively.

Incumbents must possess proven ability to effectively work with a culturally, linguistically, and ethnically diverse faculty, staff, and student. They are expected to have excellent oral and written communication skills along with strong Information technology literacy skills such as Microsoft Office (Word, Excel, Outlook, Teams etc.)

Preferred qualifications: A bachelor's degree, experience working in admissions higher education and experience using a CRM or student information system for a minimum of one (1) year.

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Applicant pool summary (bolded = goal candidates)

	Total			White		Black		Hispanic		AAIANHNPI		Two or More		UNKNOWN		
	Total	M	F	M	F	M	F	M	F	M	F	M	F	M	F	U
Total Applicants	82	22	56	7	31	5	11	3	9	1		3	1	3	4	4
Not Qualified	72	18	50	6	28	3	10	3	8	1		2	1	3	3	4
Total Qualified	10	4	6	1	3	2	1		1			1		1		
Qual No Interview	0	0	0													
Qual Rec Interview	10	4	6	1	3	2	1		1			1		1		
Withdrew	1	0	1		1											
Interviewed	9	4	5	1	2	2	1		1			1		1		
Offered	1	0	1		1											
Not Accepted	0	0	0													
Hired	1	0	1		1											

Charter Oak State College received eighty-two (82) applications for this position, which included 3HM goal candidates.

Of the eighty-two (82) applications, seventy-two (72) applications were deemed not qualified including 3HM goal candidates.

- 3HM did not possess a minimum of two (2) years of relevant enrollment services experience.

Charter Oak State College did not achieve a goal with the hire of one (1) White female who possessed the minimum and preferred qualifications and was selected based on her interview responses. The candidate had direct experience working with non-traditional students and had experience using CRM in her current position. The candidate had experience working in higher education and direct experience working with students.

3. Academic and Career Navigator (Professional/Non-Faculty) (1WF)

Position Summary: Reporting to the Director of Workforce Development, the Academic & Career Navigator is the chief facilitator of student enrollment and progress for those taking online Workforce Development (non-credit) classes. The Academic & Career Navigator manages a caseload of students using independent judgement based on adult development and learning theory and knowledge of a wide range of learning opportunities, including an understanding of current trends in short-term, workforce relevant subjects.

This position was posted on the following sites: Higheredjobs.com, DiverseEducation.com, DiversityTrio, LinkedIn, Glassdoor, Indeed.com, ZipRecruiter, Adzuna, neuvo, Jobcase.com, Job.net, Sercanto, Careerjet, Oodle, ct.edu, and sent through the CSCU email system distribution list.

Minimum qualifications: A Bachelor's degree from a regionally accredited institution is required, along with one to three years of experience working with adult learners. Demonstrated competency in computer applications, including graphic designing, ability to work independently in a fast-paced

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environment and excellent organization skills and attention to detail.

Incumbents must possess proven ability to effectively work with a culturally, linguistically, and ethnically diverse faculty, staff, and student. They are expected to have excellent oral and written communication skills along with strong Information technology literacy skills such as Microsoft Office (Word, Excel, Outlook, Teams etc.)

Preferred qualifications: Master's degree in higher education or related field, extensive knowledge of current adult development and learning theory, experience of working with non-credit students, experience working with students in a distance learning environment, experience using graphic design software to create marketing flyers and newsletters, as well as experience collaborating with community organizations to recruit students, and experience using database management software.

Applicant pool summary (bolded = goal candidates)

	Total			White		Black		Hispanic		AAIANHNPI		Two or More		UNKNOWN		
	Total	M	F	M	F	M	F	M	F	M	F	M	F	M	F	U
Total Applicants	73	13	56	8	27	3	13	2	8		4		2		2	4
Not Qualified	5	1	4	1	1		1		1				1			
Total Qualified	68	12	52	7	26	3	12	2	7		4		1		2	4
Qual No Interview	60	12	45	7	24	3	11	2	5		3				2	3
Qual Rec Interview	8	0	7		2		1		2		1		1			1
Withdrew	1	0	1						1							
Interviewed	7	0	6		2		1		1		1		1			1
Offered	1	0	1		1											
Not Accepted	0	0	0													
Hired	1	0	1		1											

Charter Oak State College received seventy-three (73) applications for this position of which there were 2HM, and 4AF goal candidates. Of the seventy-three (73) applications, five (5) candidates were deemed not qualified. The remaining sixty-eight (68) candidates included 2HM and 4AF goal candidates. Of this group, 1AF was interviewed. The disposition for the goal candidates is as follows:

- 1AF who was interviewed did not demonstrate an understanding of community-based organizations, she did not provide clear examples of career assessment tools, nor did she provide information about an advising approach which is necessary for the position during her interview.
- 3AF and 1HM were not selected for an interview as they did not possess experience using graphic design software to create marketing materials, experience with community-based organizations, nor did they have experience working with non-credit students.
- 1HM was not selected for an interview as they did not possess experience working with non-credit students, nor did they possess experience with community-based organizations.

Charter Oak State College did not achieve a goal with the hire of 1WF. 1WF was selected because she possessed experience working with community-based organizations in her role as a Business &

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Community Liaison and Work-Based Learning Coordinator. She also served as chair of a community relations council and the workforce industry council. The selected candidate also possessed experience creating advertising and marketing tools and had experience enrolling, monitoring and evaluating students in work-based learning programs.

4. Bachelor of Social Work Field Director (Professional/Non-Faculty) (1BF)

Position Summary: Reporting to the Bachelor of Social Work (BSW) Program Director, the BSW Field Director is responsible for follow up with the site by orienting, contracting, and checking in with site supervisor throughout the year for the Bachelor of Social Work (BSW) program. During the advising process, students can communicate with the Field Director/Field Office on the types of field placements they would like to be directed to. A key role of the Field Director is to engage with community organizations to secure future field sites. The Field Director also creates and edits the comprehensive field manual in accordance with Council on Social Work (CSWE) standards. The Director also teaches one course per semester which can include the field placement course/s.

This position was posted on the following sites: HigherEdJobs.com, DiverseEducation.com, DiversityTrio, LinkedIn, Glassdoor, Indeed.com, ZipRecruiter, Adzuna, neuvoo, Jobcase.com, Job.net, Sercanto, Careerjet, Oodle, ct.edu, and sent to the C SCU email system distribution list.

Minimum qualifications: A master's degree in social work from a CSWE accredited institution; experience with CSWE accreditation; one (1) to three (3) years' field placement teaching experience; one (1) to three (3) years higher education program experience at a CSWE accredited institution; experience developing field placement standards; ability to motivate and manage practicum sites at a distance; excellent organization skills and attention to detail.

Incumbents must possess proven ability to effectively work with a culturally, linguistically, and ethnically diverse faculty, staff, and student. They are expected to have excellent oral and written communication skills along with strong Information technology literacy skills such as Microsoft Office (Word, Excel, Outlook, Teams etc.)

Preferred qualifications: Doctor of Social Work (DSW) Degree, experience administering a BSW or MSW field placement program in an online format, experience building curriculum with Universal Design for Learning (UDL) and/or inclusive design principles.

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Applicant pool summary (bolded = goal candidates)

	Total			White		Black		Hispanic		AAIANHNPI		Two or More		UNKNOWN		
	Total	M	F	M	F	M	F	M	F	M	F	M	F	M	F	U
Total Applicants	89	10	73	7	28	1	22		2		3		4	2	14	6
Not Qualified	75	9	60	6	26	1	16		2		3		1	2	12	6
Total Qualified	14	1	11	1	2		6						3		2	
Qual No Interview	3	0	3		2		1									
Qual Rec Interview	11	1	8	1			5						3			2
Withdrew	5	0	5				4						1			
Interviewed	11	1	8	1			5						3			2
Offered	1	0	1				1									
Not Accepted	0	0	0													
Hired	1	0	1				1									

Charter Oak State College received eighty-nine (89) applications for this position of which there were 3AF goal candidates. Of the eighty-nine (89) applications, seventy-five (75) candidates were deemed not qualified, which included the 3AF. The disposition for the goal candidates is as follows:

- 3AF did not possess the required field placement teaching experience and did not have experience developing field placement standards.

Charter Oak State College did not achieve a goal with the hire of 1BF. 1BF was selected because she possessed a master's degree in social work, experience working in field placement as a director and implemented individualized placements for students. The selected candidate also possessed experience working in online education and had knowledge of online andragogy. The candidate also successfully renewed CSWE accreditation.

5. Assistant Director, Early Childhood Education (1WF)

Position Summary: The position supports the Director of Early Childhood Education in managing the work of the Early Childhood Department. This includes Alternative Route to Credentialing (ARC) oversight and supervision, early childhood program development including course curriculum design and revisions, hiring of faculty, National Association for the Education of Young Children (NAEYC) accreditation, and staying informed and up to date with any OEC (Office of Early Childhood) or CSDE (CT State Department of Education) changes to teacher education program requirements. The position also includes academic advising of students registered in the ECE, Child Studies, and ARC programs. Academic Advising shall not exceed one hundred students.

This position was posted on the following sites: HigherEdJobs.com, DiverseEducation.com, DiversityTrio, LinkedIn, Glassdoor, Indeed.com, ZipRecruiter, Adzuna, neuvo, Jobcase.com, Job.net, Sercanto, Careerjet, Oodle, ct.edu, and sent through the CSCU email system distribution list.

Minimum qualifications: A master's degree and a minimum of three (3) years of college teaching experience in early childhood, special education, or human growth and development. The

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successful candidate should be knowledgeable of NAEYC Professional Standards and Competencies for Early Childhood Educators, early childhood care delivery systems, and early childhood degree programs.

Incumbents must possess proven ability to effectively work with a culturally, linguistically, and ethnically diverse faculty, staff, and student. They are expected to have excellent oral and written communication skills along with strong Information technology literacy skills such as Microsoft Office (Word, Excel, Outlook, Teams etc.)

Preferred qualifications: Ph.D., as well as experience teaching in an early childhood certification program preferred. Knowledge of CT State Department of Education C112 certification requirements, experience in preparing students for the edTPA for early childhood and special education, and experience in using Watermark Student Learning and Licensure Program (or other assessment/portfolio software) for documentation of data and assessment are also preferred.

Applicant pool summary (bolded = goal candidates)

	Total			White		Black		Hispanic		AAIANHNPI		Two or More		UNKNOWN		
	Total	M	F	M	F	M	F	M	F	M	F	M	F	M	F	U
Total Applicants	195	17	158	5	84	6	34	2	11	1	4	1	9	2	16	20
Not Qualified	160	15	129	3	65	6	28	2	10	1	3	1	8	2	15	16
Total Qualified	35	2	29	2	19		6		1		1		1		1	4
Qual No Interview	26	1	23	1	15		4		1		1		1		1	2
Qual Rec Interview	9	1	6	1	4		2									2
Withdrew	2	1	0	1												1
Interviewed	7	0	6		4		2									1
Offered	1	0	1		1											
Not Accepted	0	0	0													
Hired	1	0	1		1											

Charter Oak State College received one hundred ninety-five (195) applications for this position of which there were 2HM and 4AF goal candidates. Of the one hundred ninety-five (195) applications, one hundred sixty (160) candidates were deemed not qualified, which included 2HM and 3AF. The disposition for the goal candidates is as follows:

- 2AF did not possess the required master's degree, nor any college teaching experience in early childhood, special education, or human growth and development. They also did not possess the required knowledge of NAEYC Professional Standards.
- 1AF and 1HM did not possess the required college teaching experience in early childhood, special education, or human growth and development. The candidates also did not possess the required knowledge of NAEYC Professional Standards.
- 1HM did not possess the required knowledge of NAEYC Professional Standards.

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The remaining thirty-five (35) applicants were qualified, including 1AF. The disposition for the goal candidate qualified but not interviewed is as follows:

- 1AF did not possess any of the preferred qualifications (no Ph.D., no experience teaching in teacher certification programs, and no other preferred qualifications).

Charter Oak State College did not achieve a goal with the hire of 1WF. The candidate was selected because she possessed a master's degree in early childhood education and enrolled in a Doctor of Education in Educational Leadership program. The candidate also possessed knowledge of CT State Department of Education C112 certification requirements, experience in preparing students for the edTPA for early childhood and special education, and experience in using Watermark Student Learning.

6. Associate Director of Enterprise Applications (1WM)

Position Summary: The Associate Director of Enterprise Applications assists in managing the student information system Jenzabar along with the college's broader portfolio of software to ensure technology across campus serves the college's mission. This individual will often serve as a facilitator between end user and vendor for those services sourced to third parties.

Individuals performing this role are responsible for the perpetual support, maintenance and modifications to information systems with a focus on SQL databases. As a member of the broader technology team serving the college, they work closely as an escalation point for the college's Technology Help Desk to address end user inquiries.

The Associate Director analyzes and designs detailed specifications for applications that solve the needs of the campus community. Solutions range from simple to complex and may be independently deployed or implemented through a team or more formalized project. The employee will be challenged to be a problem solver, innovator and trusted adviser to the college's Chief Information Officer.

This position was posted on the following sites: Higheredjobs.com, DiverseEducation.com, DiversityTrio, LinkedIn, Glassdoor, Indeed.com, ZipRecruiter, Adzuna, neuvo, Jobcase.com, Job.net, Sercanto, Careerjet, Oodle, ct.edu, and sent to the CSU email system distribution list.

Minimum qualifications: Incumbents are required to have demonstrated advanced knowledge and abilities in the following: Bachelor's degree in technology related field; a minimum of five (5) years of experience in systems analysis, SQL server database administration and/or computer programming; experience in preparing manuals, reports and documentation for applications; and excellent written and organizational skills with proven ability to implement technology solutions to end users.

Incumbents must possess proven ability to effectively work with a culturally, linguistically, and ethnically diverse faculty, staff, and students. They are expected to have excellent oral and written communication skills along with strong information technology literacy skills such as Microsoft Office (Word, Excel, Outlook, Teams etc.).

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Preferred qualifications: Experience with Student Information Systems (such as Jenzabar), experience with Learning Management Systems (such as Blackboard LMS), experience with Financial Aid Tools (such as PowerFaid), experience with Document Imaging Systems (such as Hyland OnBase) and experience with Higher Ed CRM Applications (such as TargetX).

Applicant pool summary (bolded = goal candidates)

	Total			White		Black		Hispanic		AAIANHNPI		Two or More		UNKNOWN		
	Total	M	F	M	F	M	F	M	F	M	F	M	F	M	F	U
Total Applicants	54	30	14	17	7	2	1	2	2	3	3		1	6		10
Not Qualified	37	20	10	8	4	2	1	2	2	3	3			5		7
Total Qualified	17	10	4	9	3								1	1		3
Qual No Interview	11	6	2	5	1								1	1		3
Qual Rec Interview	6	4	2	4	2											
Withdrew	1	0	1		1											
Interviewed	6	4	2	4	2											
Offered	2	1	1	1	1											
Not Accepted	1	0	1		1											
Hired	1	1	0	1												

Charter Oak State College received fifty-four (54) applications for this position of which there were 2HM and 3AF goal candidates. Of the fifty-four (54) applications, thirty-seven (37) candidates were not qualified, which included 2HM and 3AF. The disposition for the goal candidates is as follows:

- 1HM and 1 AF did not possess a degree in a technology related field, and their resumes did not demonstrate they possessed the required five (5) years of systems analysis, SQL server database administration and/or computer programming.
- 1HM and 1 AF possessed the requisite technical degree, but their resumes did not demonstrate they possessed the required five (5) years' experience in systems analysis, SQL server database administration and/or computer programming.
- 1AF did not possess a degree in a technology related field.

The remaining seventeen (17) applicants were qualified and there were no goal candidates in this group.

The college did not achieve a goal with the hire of 1WM. The applicant was selected because he possessed a bachelor's degree in computer information systems, possessed over 17 years of experience working with Jenzabar, along with SQL and power-scripting, PowerFaid, EDConnect, and Sharepoint experience. Further, the selected candidate possessed experience working in higher education and demonstrated a student-centered approach to problem solving through his answers to the interview questions and the examples he provided during the interview.

7. Assistant Coordinator, Early Childhood Education (Professional/Non-Faculty) (1HF)

Position Summary: The Assistant Coordinator of Early Childhood Education serves as both an academic advisor to students as well as a practicum placement coordinator for students enrolled

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in early childhood programs. As academic advisor, the incumbent will provide support to students related to the academic program. This includes meeting with students to understand how to navigate the various financial aid and scholarship options that may be available to them. As practicum placement coordinator, the incumbent will observe students enrolled in the ARC program (Alternative Route to Teacher Certification), which prepares students for the #112 Teacher Certification in CT) and provide timely and effective feedback on teaching strategies to support them in developing skills to work either in Birth-to-Three or CT Public Schools (Pre-K/K). The incumbent will develop and deliver instruction to ARC students during Saturday sessions to prepare them for practicum experiences. The incumbent will also manage all responsibilities related to student practicum experiences, including tracking of student field experiences, approval of practicum locations, providing supports to mentor teachers, etc.

Additional responsibilities will include managing the Early Childhood Career Center.

This position was posted on the following sites: Higheredjobs.com, DiverseEducation.com, DiversityTrio, LinkedIn, Glassdoor, Indeed.com, ZipRecruiter, Adzuna, neuvoo, Jobcase.com, Job.net, Sercanto, Careerjet, Oodle, ct.edu, and sent to the CSCU email system distribution list.

Minimum qualifications: Master's degree in early childhood education and prior experience in either a certified teaching position or leadership position in a childcare center. Must have experience working with the Birth-to-Three population (infants and toddlers) and additional experience with working as a teacher of preschoolers and/or kindergarten age children. Advanced skills in technology required. Ability to use technology to create graphs to analyze student data related to teaching competencies.

Incumbents must possess proven ability to effectively work with a culturally, linguistically, and ethnically diverse faculty, staff, and students. They are expected to have excellent oral and written communication skills along with strong information technology literacy skills such as Microsoft Office (Word, Excel, Outlook, Teams etc.).

Preferred qualifications: Teacher certification in ECE/Integrated Special Education (CT 112 or 113 or equivalent); five (5) years of experience supporting teacher professional development, to include coaching & facilitating workshops; and strong command of Microsoft Office products, especially Excel.

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Applicant pool summary (bolded = goal candidates)

	Total			White		Black		Hispanic		AAIANHNPI		Two or More		UNKNOWN		
	Total	M	F	M	F	M	F	M	F	M	F	M	F	M	F	U
Total Applicants	42	2	40		27		5	1	3		3			1	2	
Not Qualified	0	0	0													
Total Qualified	42	2	40		27		5	1	3		3			1	2	
Qual No Interview	34	0	34		23		5		1		3				2	
Qual Rec Interview	8	2	6		4			1	2					1		
Withdrew	1	1	0											1		
Interviewed	7	1	6		4			1	2							
Offered	1	0	1						1							
Not Accepted	0	0	0													
Hired	1	0	1						1							

Charter Oak State College received forty-two (42) applications for this position of which there were 1HM and 3AF goal candidates. All forty-two (42) applications were deemed qualified. 3AF were among the candidates who were minimally qualified, but not interviewed. The candidate pool contained applicants who possessed all of the minimum and preferred qualifications. Individuals who did not possess all of the preferred qualifications were not invited for interview. Specifically, the disposition for the goal candidates who were not interviewed is as follows:

- 1AF did not possess teacher certification in ECE/Integrated Special Education (CT 112 or 113 or equivalent) and did not have five (5) years of experience supporting teacher professional development (including coaching and facilitating workshops).
- 1AF did not possess teacher certification in ECE/Integrated Special Education (CT 112 or 113 or equivalent).
- 1AF did not possess five (5) years of experience supporting teacher professional development (including coaching and facilitating workshops).

The remaining eight (8) applicants were invited for an interview, including 1HM. The disposition for the one goal candidate is as follows:

- 1HM had experience teaching preschoolers, however, he did not possess early childhood experience in programs that have utilized developmentally appropriate practice teaching methods. Further, the candidate did not have experience working with birth-to-three program and did not articulate understanding of adult learning theory.

Charter Oak State College did not achieve a goal with the hire of 1HF. The candidate was selected because she possessed the required master's degree and over 15 years of experience working in early childhood. The candidate possessed experience developing curriculum and demonstrated an understanding of adult learning theory and the need for adults to self-direct their own learning. She provided examples of her knowledge and experience in all these areas throughout the interview.

Section 46a-68-90 - GOALS ANALYSIS
December 1, 2022 – November 30, 2024

8. Assistant Director, Financial Aid (1BF)

Position Summary: The Assistant Director is responsible for overseeing the daily pipeline of students seeking funding from the Office of Financial Aid. This position plays a critical role in institutional recruitment, retention and revenue goals and is responsible for ensuring the Financial Aid component of those elements is delivered at an exceptional service level.

This position was posted on the following sites: HigherEdJobs.com, DiverseEducation.com, DiversityTrio, LinkedIn, Glassdoor, Indeed.com, ZipRecruiter, Adzuna, neuvoo, Jobcase.com, Job.net, Sercanto, Careerjet, Oodle, ct.edu, and sent to the CSCU email system distribution list.

Minimum qualifications: Bachelor's degree from a regionally accredited institute of higher education or a combination of education, training, and experience which would lead to the competencies required for successful performance of the position's essential duties.

Incumbents are required to have demonstrated advanced knowledge and abilities in the following: a minimum of four (4) years of comprehensive financial aid experience including the possession of understanding compliance materials associated with the awarding and disbursement of financial aid; strong oral and written communication skills; ability to work independently; the ability to work independently; and be able to demonstrate a command of and utilization of technology to further manage the objectives of the team; successful history of teaming with stakeholders and/or constituents outside of their reporting channel to further the mission of their employer.

Incumbents must possess proven ability to effectively work with a culturally, linguistically, and ethnically diverse faculty, staff, and students. They are expected to have excellent oral and written communication skills along with strong information technology literacy skills such as Microsoft Office (Word, Excel, Outlook, Teams etc.).

Preferred qualifications: Prior experience utilizing PowerFacts and/or Jenzabar Financial Aid Modules; experience understanding of financial aid regulations related to attendance taking, module-based schools; and experience managing customer service operations (i.e. quality dashboards, call center, etc.).

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December 1, 2022 – November 30, 2024

Applicant pool summary (bolded = goal candidates)

	Total			White		Black		Hispanic		AAIANHNPI		Two or More		UNKNOWN		
	Total	M	F	M	F	M	F	M	F	M	F	M	F	M	F	U
Total Applicants	64	13	48	7	23	3	12	2	6	1	4		2		1	3
Not Qualified	57	9	45	5	22	3	11		6	1	4		1		1	3
Total Qualified	7	4	3	2	1		1	2					1			
Qual No Interview	0	0	0													
Qual Rec Interview	7	4	3	2	1		1	2					1			
Withdrew	1	0	1										1			
Interviewed	6	4	2	2	1		1	2								
Offered	1	0	1				1									
Not Accepted	0	0	0				0									
Hired	1	0	1				1									

Charter Oak State College received sixty-four (64) applications for this position of which there were 2HM and 4AF goal candidates. Fifty-seven (57) applications were deemed not qualified, including 4AF goal candidates. The disposition for the goal candidates who were not interviewed is as follows:

- 4AF did not possess the minimum requirement of four (4) years of comprehensive experience in financial aid.

The remaining seven (7) applicants were invited for an interview, including 2HM. The disposition for the goal candidates who were interviewed, but not selected, is as follows:

- 2HM were not selected for the position as they did not provide details of their related experience working directly with adult learners. Both candidates expressed experience working with traditional students, which is not reflective of the college population, and they were not able to state how their knowledge and experience could transfer to support the needs of adult learners.

The college did not achieve a goal with the hire of 1BF. The candidate was selected because she possessed the required bachelor's degree, as well as a master's and doctoral degree and over 10 years of experience working in financial aid. The individual possessed experience working with PowerFaids, Jenzabar and with Federal Systems (COD & NSLDS). The candidate demonstrated a student-focused approach to service delivery and possessed experience working with adult learners and modules.

Section 46a-68-90 - GOALS ANALYSIS
December 1, 2022 – November 30, 2024

Promotional Goals Analysis

Executive

- Goals: None
- Promotions: 3 WF
- Goal Achievement: N/A

1. Health Sciences and Technology Program Director (1WF)

	Total			White		Black		Hispanic		AAIANHNPI		Two or More		Unknown		
	Total	M	F	M	F	M	F	M	F	M	F	M	F	M	F	U
Total Applicants	3	0	3		3											
Not Qualified	1	0	1		1											
Total Qualified	2	0	2		2											
Qual No Interview	0	0	0		0											
Qual Rec Interview	2	0	2		2											
Withdrew	0	0	0		0											
Interviewed	2	0	2		2											
Offered	1	0	1		1											
Not Accepted	0	0	0		0											
Hired	1	0	1		1											

Although a promotional goal was not set, the College posted for the Health Sciences and Technology Program Director and an internal candidate applied and was selected. The WF moved out of the Professional category and into the Executive category as a result of this action.

2. Director of Workforce Development (1WF)

During the reporting period 1WF employee assumed additional duties and was reclassified from Assistant Director of Corporate Outreach to Director of Workforce Development.

3. Director of Accessibility Services (1WF)

During the reporting period 1WF assumed additional duties and was reclassified from Assistant Director of Accessibility Services to Director of Accessibility Services.

Section 46a-68-90 - GOALS ANALYSIS
December 1, 2022 – November 30, 2024

Program Goals Analysis

The following programmatic goals were established in the 2022 – 2024 Charter Oak State College Affirmative Action Plan.

1. **Goal:** The College will support the CSCU System Office's goal to train all managers within the College on DEI, EEO, Civil Rights, and Managing a Diverse workforce.

Responsible: DEI and EEO Center of Excellence.

Timeframe: Completion by June 30, 2023.

Goal achievement: This goal was achieved through the implementation of the Manager DEI training program, which included Bias in the Hiring Process; Implicit Bias/Microaggressions, Being Equity Minded, Managing a Diverse Workforce, from December 2022 through April 2023. Fifty-seven of Charter Oak State College staff attended trainings in these areas.

2. **Goal:** The College will support the CSCU System Office's goal to train all staff on Domestic Violence.

Responsible: DEI and EEO Center of Excellence.

Timeframe: Completion by June 30, 2024

Goal achievement: This goal was achieved through training provided by the CSCU System. Fifty-three (53) of the staff at Charter Oak State College participated in the training during the reporting period.

Section 46a-68-91
Career Mobility

SECTION 46a-68-91 - CAREER MOBILITY

Charter Oak State College recognizes the value of career mobility within State service and believes that making greater use of employees' skills and abilities as well as developing employees for higher level work are essential aspects of sound management and affirmative action. However, the College has experienced challenges in creating a career mobility program. The collective bargaining agreement that covers most of the professional employees does not have a mechanism for promotion. The size of the College's workforce (66 full-time positions at the close of the reporting period) and the specialized job structure (characteristic of most of the positions in this workforce) limits career mobility and promotional opportunities. The College currently has two groups of employees: administrators (executive management) and professionals.

Despite the limitations imposed by the organizational structure, there have been instances where employees have been reclassified to higher ranks. The reclassifications occur as responsibilities evolve, requiring an adjustment to the pay structure. During the reporting period, two (2) individuals were reclassified from professional classifications to executive management positions and one (1) individual in the professional classification applied and was selected through a search for an executive management position. Within the professional classification, there were four (4) reclassifications due to changes in responsibilities, and one (1) within the executive classification.

The skills required for the administrators and professionals are specialized and technical in nature. Therefore, Charter Oak State College, while limited to affect a great amount of change in this job structure, supports and encourages employees who seek to qualify themselves for higher ranked positions in several ways.

1. The College has established a successful program to provide staff professional development opportunities, both in-house and through outside contractors. The College encourages staff participation in formalized educational pursuits.
 - a. The Department of Administrative Services (DAS) supports training programs through a partnership with CSU. Employees are notified annually of opportunities to attend training and either college and/or union funds are utilized for participation in these trainings. During this reporting period employees were notified of the opportunities and six (6) employees attended training sessions.
 - b. Employees continue with ongoing professional development opportunities funded through collective bargaining or institutional funds aimed at maintaining or expanding current knowledge of professional issues through conferences or workshops as well as educational degrees outside the College. During this reporting period thirty-five (35) employees participated in conferences.
 - c. A tuition waiver program is available for Charter Oak employees who wish to take courses towards a degree at Charter Oak. During this reporting period sixteen (16) employees received reimbursements.
 - d. Training funds are usually included in departmental budgets to send staff to specialized training or conferences. Formal career counseling is made available to all staff upon request or to those whose performance suggests that they would benefit from it. Reclassification requests remain as the primary vehicle for upgrading the level of a position for professional staff. This process is initiated when the employee, supervisor, executive manager and personnel manager all agree that the duties and responsibilities have increased to a level justifying a position reclassification. The decision of the outside reviewer confirms or denies the reclassification request.

In addition to promotions and reclassifications, merit awards were approved in the professional union contract beginning July 1, 2000, and continues to be awarded as outlined in the current contract. Merit awards are based upon outstanding performance, innovative projects or initiatives, or other efforts or undertakings that have or would greatly benefit the College and/or its students. This program consists of employees submitting nominations for their peer's contributions to a Labor-Management Committee. This Committee then makes recommendations to the President. The President makes the final selections from the list of recommendations. During this reporting period forty-six (46) employees received merit awards.

ADA Interactive Process:

All employees with a documented disability are eligible to receive reasonable accommodation to perform the essential functions of their job. The Director of Human Resources serves as the College's ADA Coordinator and engages in the interactive process for all requests and conducts an essential job function analysis in support of the accommodation needed.

Upon receipt of the appropriate medical information or specific request for accommodation, a review of the detailed documentation completed by a medical provider is conducted and a meeting is held with the employee, the ADA Coordinator/HR staff to discuss options. The final step is to provide reasonable accommodation to assist the employee in handling the essential functions of the position with the approved modifications.

The College also provides reasonable accommodations to anyone scheduled for an interview that makes the request and accommodates the public to attend courses, programs and events.

Finally, please note, most of the positions at Charter Oak State College are unionized. The administrators, along with one professional staff, are not unionized.

Section 46a-68-92
Good Faith Efforts

Section 46a-68-92 – GOOD FAITH EFFORTS

The Charter Oak State College has demonstrated good faith efforts by engaging 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 non-discrimination 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.
- 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.
- c) Ensured a fair and nondiscriminatory selection process.
 - 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.

- 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.
- e) Nothing in this section shall be construed to absolve an agency of its obligations under section 46a-68-78, 46a-68-79, 46a-68-80, 46a-68-81, 46a-68-85, 46a-68-89, and 46a-68-90 and 46a-68-92 of the Regulations of Connecticut State Agencies.

Section 46a-68-93
Innovative Programs

Section 46a-68-93 – INNOVATIVE PROGRAMS

The development and implementation of programs not covered elsewhere in Sections 46a- 68-78 through 46a-68-92, inclusive, is an opportunity for creative and innovative agency measures. These measures may ultimately create opportunities not otherwise available to achieve the full and fair participation of all protected group members. Programs offered through Charter Oak State College aimed to increase opportunities for members of all protected groups include:

- utilization of non-competitive positions – currently, all of the 66 full-time positions at the College are potentially non-competitive;
- utilization of members of Charter Oak’s 285 consulting faculty as additional recruitment sources. Charter Oak’s consulting faculty are employed full time at other Connecticut colleges – used during this reporting period’s external searches- see Section 48a-68-80;
- utilization of outreach advisors as additional recruitment sources when contacting businesses and organizations, including those which target a protected class audience – used during the external searches of this reporting period – see Section 48a-68-80;
- utilization of Charter Oak State College’s website for position announcements;
- a formal policy for reducing work week hours, a full-time employee may request of management that their position be adjusted to a part-time status of 39 hours/week or less but not below 20 hours/week;
- tuition reimbursement for employees enrolled in Charter Oak State College Certificate, Associates, Bachelors, Masters degree programs;
- participation in the Department of Administrative Services In-Service Training Program to foster professional development;
- professional development fund for union employees for tuition reimbursement or professional development;
- utilization of internal budget dollars for professional development of staff;
- agency-wide training on technology changes and strategic initiatives like customer service;
- diversity, mandatory reporter, workforce violence prevention, and sexual harassment prevention training for all new employees as mandated by the Connecticut legislature;
- offer internships/student workers from colleges and universities;
- use of higher education focused webinars for staff to keep updated on current issues in higher education;
- utilization of media that advertise positions on the internet and in print are used during the external searches of this reporting period – see Section 48a-68-80; and
- a telecommuting program adopted by the College in November 2001 is in place and allows employees to work from home.

46a-68-94
Concluding Statement

CONCLUDING STATEMENT

I, Ed Klonoski, President of Charter Oak State College, acknowledge that the ultimate responsibility for promoting and enforcing affirmative action rests with me. Every good faith effort to achieve the goals and objectives of the plan have been made. I also attest that Rebecca Cannon-Klemen, Equal Employment Opportunity Specialist, reported directly to me during the reporting period.

I pledge that the College and I will make every good faith effort to achieve the new objectives, goals, and timetables set forth in this plan.

A handwritten signature in black ink, reading "Ed Klonoski".

Ed Klonoski
President, Charter Oak State
College

March 2025