

AFFIRMATIVE ACTION PLAN
FOR MINORITIES & WOMEN

University of Connecticut Health Center

UCHC Farmington, CT

July 1, 2008 - June 30, 2009

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VP for Health Affairs, Dean of Medical School

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TABLE OF CONTENTS

Preface

Introduction

Responsibility for Implementation

Organizational Profile

Job Group Analysis

Availability Analysis

Comparison of Incumbency and Availability

Placement Goals

Identification of Problem Areas

Development and Implementation of Action Oriented Programs

Internal Audit & Reporting System

Conclusion

Exhibits

PREFACE

University of Connecticut Health Center (also referred to as the Health Center) is fully committed to the concept and practice of equal opportunity and affirmative action in all aspects of employment.

In the preparation of this AAP, the Health Center has used the terminology used in E.O. 11246 and its implementing regulations as a guide. Therefore, the use of such terms as "underutilization," "deficiency," "concentration," "affected class," "goal," "problem area," etc. should not be construed as an admission by the Health Center, in whole or in part, that any problem area exists or that either minorities or women have been or are presently being underutilized, concentrated, or discriminated against in any way by the Health Center in violation of federal, state, or local fair employment practice laws. Furthermore, nothing contained in this AAP or its supporting data should be construed as an admission by the Health Center, in whole or in part, that it has contravened such federal, state, or local employment practice laws.

In developing and implementing the AAP, the Health Center has been guided by its established policy of providing equal employment opportunity. Any placement goals that the Health Center has established herein are not intended as rigid, inflexible quotas that must be met, but rather as targets reasonably attainable by applying every good faith effort in implementing this AAP. The use of placement goals in this AAP is not intended, nor is the effect of such placement goals intended, to discriminate against an individual or group of individuals with respect to any employment opportunities for which he, she, or they are qualified on the grounds that he, she, or they are not the beneficiaries of affirmative action themselves. Nothing herein is intended to sanction the discriminatory treatment of any person. Indeed, all employment decisions at the Health Center are made based on job-related criteria. Thus, this AAP has been developed in strict reliance upon the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission (EEOC) (29 C.F.R. Part 1608).

While University of Connecticut Health Center firmly believes in wide dissemination of its affirmative action policies and equal employment opportunity practices, this AAP contains certain proprietary information relating to Health Center's business that must be kept confidential. The detailed information provided in good faith as a part of the AAP contains specific information that, if disseminated, could be detrimental to the competitive and business interests of this company. At a minimum, the complexity of this data is subject to misinterpretation and misuse, which again can be very harmful to business goals and objectives solely unrelated to the affirmative action and equal employment opportunity concept.

Therefore, even though the Health Center is justifiably proud of the progress and placement goals that are described in the following pages, this AAP and its support data are to be disclosed only to individuals, companies and government agencies only where such individuals or entities have a legitimate business interest or legal entitlement to the information. University of Connecticut Health Center specifically requests the following:

1. If this information is submitted to the Office of Federal Contract Compliance Programs (OFCCP) pursuant to the relevant Executive Order and regulations, it is to be considered confidential and not subject to disclosure without notifying University of Connecticut Health Center of the agency's decision to disclose and providing the Health Center with ample time to contest the disclosure.

2. If this information is supplied to another government contractor, EEOC representative, or any other person who is given access to the AAP, it is not to be copied, reproduced, or disclosed without prior notification to University of Connecticut Health Center.
3. No information contained in the AAP is to be copied, removed from the premises, or released to other individuals without prior notification to University of Connecticut Health Center.
4. All monitoring system reports as required by federal regulations and laws have been completed. Reports that require specific data such as names of employees and salary information are not an official part of this AAP. This information is on file at the Health Center as Documentation and Supporting Data for AAP Reports and is available for review only as required by law.

The material set forth in this AAP is deemed to include personnel files, investigatory records, trade secrets, confidential operations information, confidential statistical data and other confidential commercial and financial data, within the meaning of the Freedom of Information Act (5 U.S.C. Section 552), Title VII of the Civil Rights Act of 1964 (as amended) (42 U.S.C. Sections 2000e et seq.), and the Trade Secrets Act (18 U.S.C. Section 1905, and 44 U.S.C. Section 3508), the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

This AAP does not constitute an express or implied contract between the Health Center and its employees, job applicants, or other persons. Nothing in this AAP provides any individual or group with a private right of action against University of Connecticut Health Center.

INTRODUCTION

The University of Connecticut Health Center delivers health care through education and research. The center is comprised of the following operating units and Correctional Managed Health Care: John Dempsey Hospital; School of Medicine; School of Dental Medicine; Graduate School of Biosciences; and private physician practices University Health Partners, University Medical Group and University Dentists. The Health Center was established in 1961.

Ever committed to affirmative action, University of Connecticut Health Center has prepared this AAP to cover employees reporting to and/or working in Farmington, CT. This plan also covers employees working in other establishments who report to managers included in this plan.

As detailed in the Job Group Analysis, this AAP covers 4234 employees including 843 (19.91%) minorities and 3003 (70.93%) women. It is expected that these employees will help us to reach mutual goals of profitability and efficiency, resulting in both business and personal growth. As described in detail in the Plan that follows, the management of University of Connecticut Health Center has a continuing commitment to the practice and implemented action of this AAP.

RESPONSIBILITY FOR IMPLEMENTATION
In accordance with 41 C.F.R. 60-2.17

Dr. Cato T. Laurencin, VP for Health Affairs, Dean of Medical School, has overall responsibility for implementation of the Equal Employment Opportunity Policy and the AAP. The Health Center has assigned primary management responsibility and accountability for ensuring full compliance with the plan to Carolyn Lyle, an official of the Health Center. The Affirmative Action Officer has the authority, resources, support of and access to top management necessary to ensure the effective implementation of the AAP. The VP for Health Affairs, Dean of Medical School actively supports the program and provides assistance whenever it is needed, making managers and supervisors aware of the program and requesting their cooperation and assistance. The name of the Affirmative Action Officer appears on internal and external communications on the Health Center's Equal Employment Opportunity Policy and AAP.

1. The duties of the Affirmative Action Officer include:

- A. Developing policy statements, AAP methods, and internal and external communication techniques. Affirmative action policies and procedures will continue to be developed to ensure an efficient yet positive interaction between the Affirmative Action Officer and the managers charged with employment responsibility.
- B. Assisting in the identification of problem areas, and developing strategies to eliminate any problems identified.
- C. Assisting line management and supervisors in devising solutions to equal employment problems, including counseling and training, to ensure full understanding of affirmative action and EEO policies and procedures.
- D. Designing and implementing monitoring and reporting methods that will:
 - Measure the effectiveness of the Health Center's equal employment and AAP.
 - Indicate any need for remedial action.
 - Determine the degree to which the Health Center's placement goals and objectives are being attained.
 - Provide management with a working understanding of the Health Center's AAP placement goals and objectives.
- E. Meeting with managers, supervisors, and employees to ensure that the Health Center's EEO policies are being followed.
- F. Ensuring that supervisors understand that their work performance is being evaluated in part on the basis of their demonstrated commitment to equal employment opportunity, and that it is their responsibility to prevent all types of unlawful workplace harassment.
- G. Serving as a liaison between the Health Center and enforcement agencies.

- H. Serving as a liaison between the Health Center and appropriate minority and women's organizations, and community action groups concerned with employment opportunities of minorities and women.
 - I. Making contact with predominately female and minority high schools, colleges, and technical schools in the area as needed.
 - J. Keeping management informed of developments in the equal employment opportunity and affirmative action area.
 - K. Conducting a periodic audit to ensure that the Health Center complies in the following ways:
 - 1. EEO posters are properly displayed.
 - 2. All employees are afforded the opportunity and are encouraged to participate in all Health Center-sponsored educational, training, recreation, and social activities.
2. The Health Center recognizes that the cooperation of department supervisors and line managers is required to reach the full potential of this AAP. Therefore, supervisors and managers are expected to:
- A. Assist the Affirmative Action Officer in the identification of any problem areas and help to eliminate any barriers to equal employment opportunity.
 - B. Whenever possible, become involved in local minority organizations, women's organizations, community action groups, and community service programs.
 - C. Work with the Affirmative Action Officer to periodically review hiring and promotion patterns and training programs to isolate impediments to the attainment of affirmative action placement goals and objectives. Results from these reviews are communicated through appropriate management meetings.
 - D. Review the qualifications of employees to ensure that minorities and women are given full opportunity for transfers and promotions.
 - E. Provide career counseling for employees as needed.
 - F. Adhere to the Health Center's policy of equal employment opportunity for all employees and ensure that the policy is understood, supported and adhered to by the employees they supervise.
 - G. Take action to prevent the harassment of employees based on protected characteristics or due to a perception that an individual might have been the beneficiary of the Health Center's affirmative action efforts.

ORGANIZATIONAL PROFILE
In accordance with 41 C.F.R. 60-2.11

As one of the diagnostic components of University of Connecticut Health Center's AAP and to conform to applicable regulations, the Health Center has completed a profile of the workforce and lines of progression at the Farmington, CT establishment effective June 30, 2008.

The organizational profile is an overview of the staffing patterns at this establishment and is used to determine whether there are areas in the workforce where minorities or women are underrepresented or concentrated. To complete our organizational profile we have elected to follow the workforce analysis/organizational display methodology.

Workforce Analysis

The Health Center has 4,608 employees, and 230 departments. The analysis identifies the departments at the Farmington, CT establishment as well as departments that are not located at Farmington, CT. These departments are:

UHP

UCONN Health Partners
99 Ash Street
East Hartford, CT 06108

UCONN Health Partners
65 Kane Street
West Hartford, CT 06119

CMHC

Garner Correctional Institution
50 Nunnawauk Road
Newtown, CT 06470

Bridgeport Correctional Institution
1106 North Avenue
Bridgeport, CT 06604

New Haven Correctional Center
245 Whalley Avenue
POB 8000
New Haven, CT 06511

York Correctional Institution
201 West Main Street
Niantic, CT 06357

Gates Correctional Institution
131 North Bridebrook Road
Niantic, CT 06357

Corrigan-Radgowski Correctional Center
986 Norwich-New London Turnpike
Uncasville, CT 06382

Cheshire Correctional Institution
900 Highland Avenue
Cheshire, CT 06410

Manson Youth Institution
42 Jarvis Street
Cheshire, CT 06410

Webster Correctional Institution
111 Jarvis Street
Cheshire, CT 06410

Hartford Correctional Center
177 Weston Street
Hartford, CT 06120

Bergin Correctional Institution
251 Middle Turnpike
Storrs, Ct 06268

Brooklyn Correctional Institution
59 Hartford Road
Brooklyn, CT 06234

MacDougall-Walker Correctional Institution
1153 East Street, South
Suffield, CT 06080

Willard-Cybulski Correctional Institution
391 Shaker Road
Enfield, CT 06082

Robinson Correctional Institution
285 Shaker Road
POB 1400
Enfield, CT 06082

Enfield Correctional Institution
289 Shaker Road
POB1500
Enfield, CT 06082

Osborn Correctional Institution
335 Bilton Road
POB 100
Somers, CT 06071

Northern Correctional Institution
287 Bilton Road
POB 665
Somers, CT 06071

UMG

University Medical Group
263 Farmington Avenue
Farmington, CT 06030

For each department lists all job titles from the lowest paid to the highest paid. For each job title, we provide the following data: the total number of incumbents, the total number of male and female incumbents, and the total number of male and female incumbents by the following racial/ethnic groups: Black, Hispanic, Asian/Pacific Islander, and American Indian/Alaskan Native. We have placed asterisks next to the managers in their department that are on site.

This analysis indicates with hand written notes if a supervisor for departments listed as CMHC is located outside of the department.

Lines of Progression

Each office, position and position classification is arranged into lines of progression that depict the order of jobs through which an employee may advance through out the Health Center. Titles without promotional opportunity shall be listed separately under the category Other- Miscellaneous Titles not in a Line of Progression. Classified positions are indicated and unclassified titles are also identified.

JOB GROUP ANALYSIS
In accordance with 41 C.F.R. 60-2.12

As the second diagnostic component of our AAP we have conducted a job group analysis. The job group analysis is the first step in comparing the representation of minorities and women in the workforce covered by this AAP with the estimate of the available qualified minorities and women who could be employed by University of Connecticut Health Center in positions covered by this AAP.

In designing our job groups we considered the following elements:

- Similarity of duties and responsibilities;
- Similarity of compensation, and
- Similarity of opportunities for advancement including training, transfers, promotions, mobility and other career enhancements.

Although not a determinative factor in designing job groups, we also attempted to create job groups that are large enough to conduct appropriate analysis.

The following charts identify the job groups created for this AAP, the job titles that comprise each job group, and the percentage of minority incumbents and the percentage of female incumbents in each job group.

AVAILABILITY ANALYSIS
In accordance with 41 C.F.R. 60-2.14

The availability analysis is a part of the Incumbency vs. Estimated Availability Analysis - the final diagnostic component of this AAP. The purpose of the availability analysis is to establish a benchmark against which the demographic composition of Health Center's workforce may be compared to determine whether barriers to equal employment opportunity may exist within particular job groups.

Pursuant to applicable regulations, the availability analysis for each job group examines two potential areas of availability: individuals with the requisite skills outside the establishment (external availability) and those within the establishment who are promotable, transferable and/or trainable (internal availability). In determining availability, we have selected our reasonable recruitment area and our pool of promotable, transferable, and trainable employees in such a way as not to exclude qualified minorities and women. Moreover, when determining external availability we have used as our source of data the most current and discrete statistical information available. For this availability analysis, we have used the 2000 census data. Finally, where a job group is composed of different job titles that carry different availability rates, we calculated a composite availability figure. We arrived at the composite availability figure by determining the proportion of the job group incumbents employed in each job title, weighting the availability for each job title by the proportion of incumbents employed in that title, and adding together the weighted availability estimates.

A brief written rationale for the selection of the recruitment areas and internal pools by job group follows:

1A - EXECUTIVE

Factor 1: *United States*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 1A - EXECUTIVE. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- There are no feeder positions for job group 1A - EXECUTIVE.

1B - UNIV DIRECTOR

Factor 1: *United States*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 1B - UNIV DIRECTOR. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 1B - UNIV DIRECTOR was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

1C - MANAGERS

Factor 1: *United States*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 1C - MANAGERS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 1C - MANAGERS was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

2A - HEAD OF DEPARTMENT

Factor 1: *United States*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 2A - HEAD OF DEPARTMENT. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- There are no feeder positions for job group 2A - HEAD OF DEPARTMENT.

2B - PROFESSOR

Factor 1: *United States*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 2B - PROFESSOR. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 2B - PROFESSOR was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

2C - ASSOCIATE PROFESSOR

Factor 1: *United States*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 2C - ASSOCIATE PROFESSOR. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- There are no feeder positions for job group 2C - ASSOCIATE PROFESSOR.

2D - ASSISTANT PROFESSOR

Factor 1: *United States*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 2D - ASSISTANT PROFESSOR. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 2D - ASSISTANT PROFESSOR was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

2E - INSTRUCTOR

Factor 1: *United States*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 2E - INSTRUCTOR. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- There are no feeder positions for job group 2E - INSTRUCTOR.

3A - REGISTERED NURSE

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3A - REGISTERED NURSE. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 3A - REGISTERED NURSE was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

3B - NURSING SUPERVISOR

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3B - NURSING SUPERVISOR. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 3B - NURSING SUPERVISOR was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

3C - SPECIALIZED NURSES

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3C - SPECIALIZED NURSES. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 3C - SPECIALIZED NURSES was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

3D - CLINICAL SUPERVISORS

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3D - CLINICAL SUPERVISORS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 3D - CLINICAL SUPERVISORS was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

3E - CLINICAL GROUP

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3E - CLINICAL GROUP. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 3E - CLINICAL GROUP was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

3F - RESEARCH

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3F - RESEARCH. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 3F - RESEARCH was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

3G - CLINICAL TECHNOLOGIST

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3G - CLINICAL TECHNOLOGIST. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- There are no feeder positions for job group 3G - CLINICAL TECHNOLOGIST.

3H - FINANCE GROUP

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3H - FINANCE GROUP. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 3H - FINANCE GROUP was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

3I - ADMINISTRATIVE GROUP

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3I - ADMINISTRATIVE GROUP. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 3I - ADMINISTRATIVE GROUP was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

3J - ADMIN PROGRAM COORDINATOR

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3J - ADMIN PROGRAM COORDINATOR. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 3J - ADMIN PROGRAM COORDINATOR was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

3K - SOCIAL WORKER

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3K - SOCIAL WORKER. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 3K - SOCIAL WORKER was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

3L - TECHNICAL PROFESSIONAL

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3L - TECHNICAL PROFESSIONAL. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 3L - TECHNICAL PROFESSIONAL was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

3M - NURSE PRACTITIONER

Factor 1: *New England (CT, MA, NY, RI)*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 3M - NURSE PRACTITIONER. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 3M - NURSE PRACTITIONER was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

4A - OFFICE ASSISTANT

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 4A - OFFICE ASSISTANT. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 4A - OFFICE ASSISTANT was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

4B - PATIENT SERVICE REP

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 4B - PATIENT SERVICE REP. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 4B - PATIENT SERVICE REP was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

4C - CLERK

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 4C - CLERK. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 4C - CLERK was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

4D - SECRETARIAL/CLERICAL

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 4D - SECRETARIAL/CLERICAL. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 4D - SECRETARIAL/CLERICAL was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

4E - ADMIN PROGRAM ASSISTANT 1

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 4E - ADMIN PROGRAM ASSISTANT 1. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 4E - ADMIN PROGRAM ASSISTANT 1 was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

4F - ADMIN PROGRAM ASSISTANT 2

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 4F - ADMIN PROGRAM ASSISTANT 2. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 4F - ADMIN PROGRAM ASSISTANT 2 was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

4G - CLINIC OFFICE ASSISTANT

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 4G - CLINIC OFFICE ASSISTANT. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 4G - CLINIC OFFICE ASSISTANT was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

5A - CLINICAL/PARAPROFESSIONAL

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 5A - CLINICAL/PARAPROFESSIONAL. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- There are no feeder positions for job group 5A - CLINICAL/PARAPROFESSIONAL.

5B - TECHNICAL/PARAPROFESSIONAL

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 5B - TECHNICAL/PARAPROFESSIONAL. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 5B - TECHNICAL/PARAPROFESSIONAL was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

5C - HEALTH CARE SUPPORT

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 5C - HEALTH CARE SUPPORT. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 5C - HEALTH CARE SUPPORT was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

5D - MEDICAL ASSISTANTS

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 5D - MEDICAL ASSISTANTS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 5D - MEDICAL ASSISTANTS was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

5E - PARAPROFESSIONAL/ ADMIN

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 5E - PARAPROFESSIONAL/ ADMIN. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 5E - PARAPROFESSIONAL/ ADMIN was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

5F - DENTAL ASSISTANT

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 5F - DENTAL ASSISTANT. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- There are no feeder positions for job group 5F - DENTAL ASSISTANT.

5G - LICENSED PRACTICAL NURSE

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 5G - LICENSED PRACTICAL NURSE. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- There are no feeder positions for job group 5G - LICENSED PRACTICAL NURSE.

6A - QUALIFIED CRAFT WORKERS

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 6A - QUALIFIED CRAFT WORKERS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 6A - QUALIFIED CRAFT WORKERS was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

7A - PROTECTIVE SERVICES

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 7A - PROTECTIVE SERVICES. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- There are no feeder positions for job group 7A - PROTECTIVE SERVICES.

7B - CUSTODIAN

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 7B - CUSTODIAN. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- There are no feeder positions for job group 7B - CUSTODIAN.

7C - OTHER SERVICE/MAINTNANCE

Factor 1: *Connecticut*- This is the geographical area from which the Health Center usually seeks or reasonably would seek workers to fill positions in job group 7C - OTHER SERVICE/MAINTNANCE. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computations*- This pool of feeder positions for job group 7C - OTHER SERVICE/MAINTNANCE was chosen based on reasonable paths of progression within the Health Center and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

COMPARISON OF INCUMBENCY AND AVAILABILITY
In accordance with 41 C.F.R. 60-2.15

University of Connecticut Health Center has compared the representation of minorities and women in each job group with their representation among those identified in the availability analysis as available for employment in the job group. Where actual representation was less than the calculated availability, the Health Center conducted a statistical test to determine whether the difference was greater than could reasonably be expected. Where the job group was of a sufficient size to analyze using the two standard deviation test, the Health Center applied that methodology. Where the use of the two standard deviation test was not appropriate, the Health Center used the exact binomial methodology. The comparison of availability with actual representation follows:

PLACEMENT GOALS
In accordance with 41 C.F.R. 60-2.16

As required by applicable regulations, University of Connecticut Health Center has established placement goals where the actual representation of women or minorities in a job group is less than would be reasonably expected based on calculated availability.

In establishing placement goals, we applied the following principles:

1. When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected given their availability percentage in that job group, the Health Center established a percentage annual placement goal at least equal to the availability figure derived for women or minorities, as appropriate, for that job group.
2. Placement goals are not quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups.
3. In all employment decisions, the Health Center makes selections in a nondiscriminatory manner. Placement goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's race, color, religion, sex, age, disability, veteran status, or national origin.
4. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
5. Placement goals are not used to supersede merit selection principles, nor do these placement goals require the Health Center to hire a person who lacks qualifications to perform the job successfully or hire a less-qualified person in preference to a more-qualified one.
6. The placement goals established in this AAP may reflect the Health Center's publicly announced permissible preference for American Indians living on or near an Indian reservation.

As is described in more detail in the Action Oriented Program section of this AAP, where a placement goal is set, the Health Center will develop action oriented steps to increase the recruitment and training of minorities or women, or both.

We have placement goals in the following job groups:

1B, 1C, 2A, 2B, 2C, 3A, 3B, 3F, 3G, 3J, 3K 3M, 4B, 4G, 5A, 5E, 6A, and 7C

**IDENTIFICATION OF PROBLEM AREAS BY
ORGANIZATIONAL UNIT AND JOB GROUP
In accordance with 41 C.F.R. 60-2.17(b)**

We have conducted in-depth analyses of our total employment process, including the workforce by organizational unit and job group, personnel activity, compensation, and other personnel procedures to determine whether and where impediments to equal employment opportunity exist.

An analysis of each of these processes follows.

1. Composition of the Workforce by Organizational Unit

Our analysis by organizational unit reveals that minorities and women are not significantly underrepresented or concentrated in any particular organizational unit.

Minorities are employed at a rate of 19.91% and are represented in 69.16% of the Health Center's 227 departments. Further, minorities are represented in 93.6% of the departments that employ 10 or more people. Women are employed at a rate of 70.93% and are represented in 92.95% of all departments, and 98.4% of all departments that employ 10 or more people. This analysis suggests that there is no policy or practice excluding minorities or women from any departments, nor is there any racial or sexual discrimination in the selection process.

2. Composition of the Workforce by Job Group

Pursuant to the Office of Federal Contract Compliance Programs' (OFCCP) regulations, we have conducted an availability analysis by job group, taking into account both external and internal availability, and have compared incumbency to estimated availability to determine placement goals. The descriptions of Factor 1 and Factor 2 by job group are summarized in the Availability Analysis. Our findings are as follows:

- A. Our analysis indicates that, for minorities, incumbency is less than availability by a statistically significant amount in the following job groups: 1C, 2B, 2C, 3J, 4B, 5E, 6A.
- B. Our analysis indicates that, for women, incumbency is less than availability by a statistically significant amount in the following job groups: 2B, 3A, 3B, 6A, 7C.
- C. The Health Center has established affirmative action placement goals and programs to address underutilization, and will continue to make a good faith effort to reach the placement goals established and implement action-oriented programs, which are detailed elsewhere in this AAP.

3. Analysis of Progress Towards Prior Year Goals

In establishing placement goals, the following principles apply:

- A. When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected given their availability percentage in that job group, the Health Center has established an annual percentage placement goal at least equal to the availability figure derived for women or minorities, as appropriate, for that job group.

- B. Placement goals are not quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups.
- C. In all employment decisions, the Health Center makes selections in a nondiscriminatory manner. Placement goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's race, color, religion, sex, age, disability, veteran status, or national origin.
- D. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
- E. Placement goals are not used to supersede merit selection principles, nor do these placement goals require the Health Center to hire a person who lacks qualifications to perform the job successfully or hire a less-qualified person in preference to a more-qualified one.

A review of progress and goal attainment by job group for the period from July 1, 2007 - June 30, 2008 reveals the following areas of significant success for minorities and women:

1B, 2D, 2E, 3C, 3F, 3H, 3I, 4C, 4D, 4E, 4F, 4G, 5C, 5D, 5F, 7A, 7B

Note - no goal was required for categories not listed above.

* YES = within one person of exceeding goal

LIMITED = Limited Opportunities. This indicates the placement goal percent multiplied by total opportunities to the job group was less than one person.

4. Personnel Activity

The Health Center has analyzed additional personnel activities to determine whether and where impediments to equal employment opportunity exist and whether there are significant selection disparities by race/ethnicity or gender. These activities include applicant flow, hires, promotions, terminations, and other personnel actions.

A. Applicant Flow

During the plan year, July 1, 2007 - June 30, 2008, the Health Center posted the majority of all open positions with the State Employment Service. The Human Resources Department accepted applications for open positions, and all persons interested in obtaining employment with the Health Center were advised to apply according to our current policy. Applications and complete records have been kept to ensure goals of equal employment opportunity are being applied to this process.

The Health Center believes that applicant flow is not and will not be a problem area. Our analysis reveals that the percentage of minority applicants compares very favorably with the general availability in the respective categories. Clearly the Health Center's success in implementing and communicating affirmative action and outreach efforts is demonstrated by these statistics.

The following reports summarize applicant flow by job group. Please note that applicants with an identified gender but no race will be included in the Applicant Detail by Gender and applicants with an identified race but no gender will be included in the Applicant Detail by Race.

B. Hires

The Human Resources Department develops all procedures and all hiring at the Health Center is conducted on the basis of nondiscriminatory criteria. Specifically, the following criteria and procedures have resulted in hiring decisions that are free of discrimination:

1. Job descriptions have been reviewed and revised to ensure that duties are accurately described, that the experience and education requirements are strictly job-related, and that all incumbents meet minimum job requirements. Job titles have and will continue to be written without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.
2. Application forms have been reviewed to ensure that all requested information is job-related, and that the forms comply with all applicable laws. In addition, all forms state that the Health Center is an Equal Opportunity/Affirmative Action Employer.
3. A company representative who is briefed in the law with regard to Equal Employment Opportunity/Affirmative Action conducts interviews.
4. Tests have been reviewed and are administered and conducted in a non-discriminatory manner.
5. All employees are encouraged to refer qualified applicants to the Health Center for employment. In addition, the Health Center has formal recruitment procedures to apprise minority and women's groups, educational institutions, and other referral sources of openings.
6. Placing an applicant in a specific job in a department is the responsibility of management. Hiring decisions are based on the applicant's knowledge, skills, abilities, and any other job-related criteria.

A review of external hires for the prior plan year indicates the presence of equal employment opportunity and a strong commitment to affirmative action. There were 522 new employees hired during the period from July 1, 2007 - June 30, 2008, including 160 minorities at 30.65% and 371 women at 71.07%. The following report summarizes hiring activity by job group:

C. Promotion Practices

A review of promotion data indicates that these practices represent an area of substantial employment opportunity for minority and female employees. Promotion practices are not problem areas for minorities and women in any job group. Our analysis reveals that neither minorities nor women are being treated disparately in promotions because:

1. The Health Center provides every reasonable opportunity for employees to advance. In this regard, training and other developmental opportunities are offered.
2. Employees are encouraged to contact their supervisor and/or the Human Resources Department, at any time, should they desire information relative to another position within the Health Center.
3. Management-initiated promotions are based on performance and other job-related criteria without discrimination on account of race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.
4. Most promotional opportunities are posted, providing all interested employees with an opportunity to apply and call their special skills to the attention of the manager.
5. Our program of career development enables all employees to designate career paths and positions for which they wish to be considered.

All of these factors strongly indicate that promotions represent an area of substantial employment opportunity for minority and female employees. A summary of promotion actions for the year is included on the following page:

D. Compensation Systems

As part of its affirmative action obligations, the Health Center has conducted a compensation analysis to determine whether there are pay disparities on the basis of gender, race, or ethnicity. According to our analysis, we have not identified any significant problem areas. If the Health Center discovers significant salary differences between men and women or non-minorities and minorities, it will determine whether they are the result of legitimate, nondiscriminatory factors such as tenure, time in job, time in grade, performance, education, previous experience, etc. Where appropriate, the Health Center will take all reasonable and immediate steps to make any necessary adjustments.

E. Terminations

The Health Center has evaluated its termination practices to determine whether there are disparities on the basis of gender, race or ethnicity. When terminations or reductions in force are necessary, the Health Center makes its decisions without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law. A report summarizing terminations by job group follows:

5. Technical Phases of Compliance

Our analysis of the technical phases of compliance reveals that the Health Center fully complies with all the technical phases of its affirmative action obligations:

- A. Equal Employment Opportunity posters are prominently displayed in each Health Center location.
- B. The Health Center notifies all contractors and subcontractors via purchase orders and subcontracts that they may be subject to federal affirmative action obligations.
- C. The Health Center requires that all of their qualified contractors and subcontractors develop and maintain a written AAP.
- D. The Health Center's employment application has a statement concerning Equal Employment Opportunity.
- E. All recruitment agencies and area schools and colleges will continue to be notified of the Health Center's commitment to the goals of affirmative action.
- F. All recruitment advertising includes the solicitation "An Equal Opportunity Employer" or its abbreviation.
- G. All other required affirmative action notices and policy statements are posted on Health Center bulletin boards and are updated annually.
- H. All personnel and employment records made or kept by the Health Center are retained for the required period as mandated by OFCCP regulations.
- I. The Health Center files annual EEO-1 and VETS-100 reports with the appropriate agencies.

**DEVELOPMENT AND IMPLEMENTATION
OF ACTION ORIENTED PROGRAMS
In accordance with 41 C.F.R. 60-2.17**

The Health Center has developed and executed action-oriented programs designed to correct any problem areas that may exist. These programs, which are listed below, demonstrate our good faith efforts to remove identified barriers, expand employment opportunities, and produce measurable results.

1. The Health Center has analyzed and will continue to analyze all positions and prepare written descriptions to accurately reflect position functions. Due to the use of a position description format, they are and will continue to be consistent for the same position from one organizational unit to another.
2. Job descriptions have been and will continue to be reviewed to determine the knowledge, skills, abilities, and other requirements necessary for the adequate performance of every job. Specifications will continue to be consistent for the same job title in all organizational units and will not contain any requirements that would result in discrimination on the basis of race, color, religion, sex, age, disability, veteran status, national origin, or other characteristic protected by law.
3. Job descriptions are available to incumbents and all members of management involved in the recruiting, screening, selection, and promotion process. Job descriptions are also made available to employees, applicants, and recruiting sources as appropriate.
4. The Health Center has carefully evaluated the total selection process and found it to be free from discrimination.
 - A. We have instructed all supervisory personnel to ensure elimination of discrimination in all personnel actions in which they are involved.
 - B. Application forms do not contain questions with potential discriminatory effects.
 - C. The Health Center does not and will not use any selection techniques that can be improperly used to discriminate against minority groups or women.
5. The Health Center has evaluated its techniques for improving recruitment and increasing the flow of qualified minority or female applicants through the following:
 - A. Minority and women, as well as non-minority and male, employees are actively encouraged to refer applicants to our organization.
 - B. The Health Center relies on the State Department of Employment as well as job fairs and recruiting programs sponsored by local community colleges and other community organizations.
 - C. The Health Center provides an orientation program to inform new employees of their equal employment responsibilities, promotional opportunities, Health Center rules, ways to alleviate any problems that might arise, and any other issues related to affirmative action compliance.

- D. Local organizations will continue to be contacted for referrals of potential minority and female employees.
- E. The Health Center utilizes the Internet to identify targeted recruitment sites for qualified minority and female applicants.
- F. Furthermore, we plan to take the following additional steps to ensure adequate representation of all minorities and women:

- (a) Where placement goals exist as defined by the OFCCP, we will continue to contact universities and two- and four-year local colleges, vocational technical schools, high schools, local business schools, and state and community organizations which attract qualified minority and female students. We will advise these institutions of our desire to fill job openings in these classifications with minority and female employees. When possible, we will continue to participate in job fair and career day activities and we will consider relevant work experience programs.
- (b) During the period from July 1, 2007 - June 30, 2008, special recruitment activities were conducted at the following schools and universities:

In an effort to expand our pool of qualified applicants to include more traditionally underrepresented minority persons the Human Resource Department attended the following career fairs: City of Hartford, Naugatuck Valley Community College, Connecticut Public Health Association, Fairfield University, University of Connecticut School of Social Work, University of Massachusetts, Western Connecticut State University, Advance Job fair for Respiratory Care occupations, Southern Connecticut State University, Nursing Spectrum, Three Rivers Community College, Athena Nursing Research, Horizon's Critical Care Nursing, University of Connecticut School of Nursing, Connecticut League of Nurses, University of Connecticut Junior Nursing Students, Career Builders.Com, Connecticut Student Nursing Association, Quinnipiac College, St. Joseph College, Central Connecticut State University, Advance for Nurses, Department of Administrative Services, Goodwin College Nursing, and the annual Urban League job fair. Recruitment booths were set up at the Nursing Leadership Conference and the Athena Research Conference. Additionally, three (3) open houses were held at the Health Center targeting nursing positions. Postcards were mailed to 13,742 registered nurses within a 25 mile radius of UCHC.

- G. We will continue to contact our normal sources of recruitment (e.g., State Employment) and advise them that under the AAP we are specifically seeking to employ minorities and/or women for job openings. During the period from July 1, 2007 - June 30, 2008, targeted recruitment activities were conducted at the following sources:

Advertisements were placed in El Canilita, which markets to the Hispanic population in major cities through out Connecticut, The Inquirer, which markets to the black population in major cities through out Connecticut, the Equal Opportunity Employment Journal, Minority Nurse, Monster.Com, local newspapers, and occupational related magazines, publications and web sites. The

Monster contract also extends the advertisements to BlackPlanet.Com, an online community for African Americans, MiGente.Com, an online community for English speaking latinos, AsianAvenue.Com, an online community for the Asian American Community, NAACP.org, the National Association for the Advancement of Colored People, HispanicOnline.com, an online resource for English-language news and information, GayWork.Com, an online community for both gay and lesbian individuals, Third Age, a site committed to strengthening the role of ThirdAgers in society, The Retired Enlisted Association, the voice of the Retired and Active Duty enlisted; and Womens Sports Services, LLC, the leading career development and recruitment solutions company in sports, specializing in job placement for women, minorities and professional athletes. The Health Center also placed a two (2) page ad in the New England Nursing Magazine, the nursing student's guide to the best career opportunities.

6. The Health Center has implemented the following programs and procedures to ensure that minority and female employees are given equal opportunities for promotion:
 - A. On-the-job training is provided to all qualified employees to assist them in developing the necessary knowledge and skills for promotion to higher-level jobs. In addition, a tuition reimbursement benefit is also available to all qualified employees.
 - B. The Health Center utilizes a formal performance evaluation program for all employees. In addition, management and supervisors are trained on the basic methodology of performance evaluation.
 - C. Neither minority nor female employees are required to possess higher qualifications than those of the lowest qualified incumbent in the job for which they apply.
 - D. Seniority practices are not a problem since the Health Center has no formal seniority system. Promotions are based on merit selection principles.
 - E. We will continue to make opportunities for advancement into more stimulating positions widely known through our career development process and by encouraging minorities and women to take advantage of these opportunities.
 - F. Special internal training programs are provided as necessary to ensure the achievement of our placement goals. The following programs are offered to eligible employees without regard to race, color, religion, sex, age, disability, veteran status, national origin or any other characteristic protected by applicable law:

UCHC offers a variety of training options to its employees. These include in-house (agency training), Department of Administrative Services sponsored in-service training, conferences/workshops, e-learning and webinars.

All training opportunities are designed to enhance employees' existing skill levels, facilitate the addition of new areas of competence, to prepare employees for future growth and/or upward mobility and to be a constant source to enable UCHC employees to fully realize their potential. In addition, specific education sessions are specially designed to meet changing organizational goals and objectives (for example, classes on change management and performance improvement). The Health Center's managers are charged with the responsibility

of identifying the required competencies for their employees and their specific job. Once the competencies are identified, the manager evaluates the level of competency and if there are any gaps, refers the employee to Human Resources/Organization and Staff Development to explore educational opportunities.

UCHC announces training opportunities through multiple communication channels to ensure that employees are notified of training programs and have the opportunity to enroll. Information regarding education offerings is circulated two (2) times per year through Broadcast messages and targeted emails. In addition, the Human Resources website posts all offerings. The Department of Administrative Services' courses, college and university course announcements are distributed through broadcast messages and catalogs posted in six (6) areas of the Health Center including off site locations and Department of Correction facilities where Correctional Managed Health Care employees are located. Tuition reimbursement notices are distributed through the HR Newsletter (published 6 times a year) and broadcast email messages. Announcements for open registration for in-house programs are distributed to all employees and announced in the institutional newsletter "*Newsline*", published weekly, and communicated to managers for employee development. Employees may also register online through the computer based education system for in house education courses and DAS courses.

In-House Training:

To address defined needs the UCHC has developed in-house workshops, seminars and classes in the following programmatic areas:

- **Employee Orientation:**

The Employee Orientation is presented at the start of each pay period. The presentation emphasizes missions and vision of the UCHC, the component parts of the organization, the services available for training, tuition reimbursement, upward mobility, safety and occupational health standards, basic fire and police procedures, the recognition programs available for employees including the website and introductions to the communication systems of the institution.

A discussion on affirmative action, equal opportunity, diversity, sexual harassment and the complaint process is provided in each orientation session. Copies of the Affirmative Action and Sexual Harassment Policy Statements and brochures are distributed. More information is provided about the Office of Diversity and Equity regarding the duties and responsibilities, the staff, office location and telephone number. The orientation program is evaluated continually with on-going analyses to ensure that new policies, issues and changes are being updated. Information on the Employee Assistance Program is provided detailing the assistance and guidance available to all employees. This program is evaluated yearly.

- **Safety Training:**

Federal and State Regulatory Training address standards of laboratory and animal safety. The UCHC provides videotape training for animal handling protocol and procedures as well as implement research safety training courses for employees as required. Employees also receive information and/or training to respond to

general safety issues; for example, fires, bomb threats, specific emergency codes and telephone numbers, etc.

- **Lab Safety Training:**

Lab Safety Training is provided to all personnel involved in laboratory activities. It covers the Health Center's Chemical Hygiene Plan, Chemical Safety, Biological Safety and the disposal of Hazardous Materials.

- **General Chemical Safety Training:**

General Chemical Safety Training is provided to employees that may be exposed to hazardous chemicals. The training includes information on the Health Center's Hazard Communication Program, Chemical Hazards, Methods to Reduce Exposure and action to be taken in the case of an emergency. It also highlights other general safety concerns and safety resources available to the employees.

- **Universal Precautions and Red Bag Waste Training:**

Universal Precautions and Red Bag Waste Training is a mandatory requirement for all employees having the potential to be exposed to body fluids. This training is required in health care institutions and is monitored carefully by internal and external governing bodies.

- **Bloodborne Pathogen Training:**

Bloodborne Pathogen Training is provided for all employees in accordance with Federal and State Regulations. All employees having the potential to be exposed to bloodborne pathogens are required to complete initial training and attend a yearly follow-up training. Live training is provided in new employee orientation and follow up training is available through computer based education.

- **Specialized Skills:**

In-house and external training consultants and experts give specialized departmental training. Various training programs are designed to address operational needs.

- **HIPAA Security and Privacy Training**

Any employee who has access to the medical record and therefore privileged medical information is required to complete HIPAA privacy training. This is completed within the first 30 days of employment via e-learning. All employees of UCHC are required to complete HIPAA Security training. Both courses are mandatory for the identified employees and compliance reports are submitted to senior administration bi-weekly.

- **Guide to the State Code of Ethics:**

All employees of UCHC are required to complete State Guide to the State Code of Ethics. The training provides information to the employees on the provisions, possible sanctions for violations, and the parameters. This is completed within the first 30 days of employment via e-learning. Compliance reports are submitted to senior administration bi-weekly.

- **Code of Conduct:**

All employees of UCHC are required to complete Code of Conduct. This training provides information to the employees on the purpose, importance of individual behaviors, components that contribute to a culture of excellence, and core values. This is completed within the first 30 days of employment via e-learning. Compliance reports are submitted to senior administration bi-weekly.

- **Clinical Enterprise:**

The UCHC Clinical Enterprise continually conducts clinical and managerial training for clinical and support staff. In addition, each new employee receives extensive orientation to their department and the institution. Continual exposure to advancing medical technologies is critical in a health care environment. Annual attendance at CPR, Infection Control, Code Blue and Hospital Safety In-Service Training is mandatory for all health care workers.

- **Public Safety Education:**

Police and Fire practice refresher courses are required of Public Safety staff in order to stay current in law enforcement and fire protection practices and legal issues. Courses are offered through the Municipal Police Training Council and by municipal police departments. Staff attendance for refreshers and recertification are regularly scheduled.

- **Management Development Training:**

The series was launched in the Spring of 2005 and continues to be a vital element of management training. It is offered to all existing management staff at UCHC, and is mandatory for newly hired managers. The courses cover education and training in the areas of HR Services, Labor Relations and Compliance. Affirmative Action, EEO and Diversity is a separate class. There are a total of fifteen (15) classes in the series.

- **Leadership Training**

The leadership center has been developed and is rolling out additional components each semester. Currently a lunch and learn series is being offered that encourages leadership to come to a sharing session over lunch to discuss topics that the leaders have identified. A leadership speaker series is anticipated to roll out in the Spring, 09. A manager/leader resource listing is available on a sharepoint site that includes website, hard copy resources and free webinars. Finally, we are in discussion with UConn/Storrs to explore the feasibility of developing a leadership institute in partnership with the Storrs campus.

- **State agency leadership program:**

One member of the OSD/HR staff is working members of other state agencies to develop a state wide leadership program. The pilot program is set to begin in January 2009. The first topics are: Strategic Planning, Performance Improvement and Project Management.

- **Managing a Harassment Free and Respectful Workplace:**

We continue to offer “Managing a Harassment Free and Respectful Workplace” Training to employees who are in positions who have supervisory functions, including faculty. The program contains the elements of the training required by Connecticut Statute, but in the expanded version opens with a discussion of respect; what it looks like and its place in the workplace. The decision was made to retrain ALL UCHC supervisors, managers, and faculty and department heads as well as training new employees who have supervisory functions. Training is conducted by staff of the Organization and Staff Development Unit of Human Resources and Office of Diversity Equity. The training consists of a rigorous three and ½ hour exchange that meets the requirements of the Sexual Harassment Awareness and Prevention legislation. In addition, the Executive Director of the Office of Diversity and Equity attends each session to answer specific questions and reacquaint the participants with her departments and its functions. Finally, information on the complaint process is also included in this session. In December of 2008, we anticipate that the retraining will be completed. We will continue to train employees who fit the criteria listed above on an ongoing basis.

- **Diversity Awareness Training:**

Training is provided for all employees as required by Connecticut General Statutes, Section 46a-54(16). Training is ongoing and is being provided by in house staff. The Curriculum being used is one that was developed with the assistance of the National Multicultural Institute, one of the state approved vendors for diversity training.

- **Webinars:**

In January, 2008 the Office of Diversity and Equity and Human Resources hosted two opportunities for community members to help promote an inclusive and respectful working environment. We hosted Connecticut Health Association webinars ‘Bullying and Mobbing; See it, Stop It and Prevent It’ and ‘The Gender Differences in Leadership Styles, Team Building and Customer Service’.

- **Training Requirement for UCHC employees who are located at CMHC:**

All employees must receive Stipulated Agreement 2.2 Training on Sexual Harassment. This training is conducted by the UCHC’s Office of Diversity and Equity and the Department of Correction (DOC) and Correction Managed Health Care (CMHC).

- **In-Service Training/Department of Administrative Services:**

All employees are advised of the course offerings for DAS Spring and Fall semesters. Supervisors are encouraged to utilize these courses as part of the annual review and goal setting process.

- **Tuition Reimbursement:**

The Tuition Reimbursement Program is available to all classified and unclassified bargaining unit employees and managers. Classified bargaining unit contracts provide tuition program reimbursement. Each contract determines the amount reimbursed per credit and per fiscal year. The Department of Administrative Services maintains the state priority lists for each collective bargaining union. Each employee receives reimbursement by the order in which they applied and

reimbursement is issued in sequence of these lists. The University Health Professionals contract is administered through the UCHC and provides for the following:

Article 21.4 - Tuition Reimbursement

Tuition is reimbursed at the rate of 100% for courses taken at the University of Connecticut and 75% of the UCONN rate for courses taken elsewhere, to a fiscal year maximum of twelve (12) credits.

For professionally related courses, which a principal investigator or a supervisor outside the bargaining unit requires an employee to take, all tuition shall be reimbursed provided that the employee successfully completes the course.

An employee shall be eligible for up to \$300.00 per year to attend conferences and workshops.

Educational Leave:

Request for leaves for University Health Professionals staff is based upon union contract.

Article 12.4 - Educational Leave

12.4a Non-degree paid or unpaid educational leave to attend conferences, seminars or workshops may be granted by the Executive Vice President for Health Affairs (Vice President for Health Affairs and Dean, School of Medicine) or his/her designee or the Hospital Director as appropriate, for purposes of professional growth and personal development. Such leave shall be related to the employee's duties and be of perceived value to the employer.

12.4b The Executive Vice President for Health Affairs (Vice President for Health Affairs and Dean, School of Medicine) may grant leave of absence without pay for reasons considered being in the best interest of the University and in the interest of professional growth and improvement of the staff member concerned. All such cases are treated as special cases. Staff members desiring such leaves should apply through their Department Head and Dean to the Executive Vice President for Health Affairs.

In accordance with the UCONN Laws and By-Laws, Twelfth Edition, faculty members are eligible for sabbatical leaves for each seven (7) years of employment.

Seminars, Workshops and Conferences:

As an educational institution, the Health Center encourages individual participation in conferences, workshops and continuing education. The institution pays much of the conference attendance. Staff and particularly faculty, are also expected to give papers and presentations in specialized areas, both nationally and internationally. The scope of conference attendance and continuing education participation is extensive. Because faculty members conduct and attend conferences as part of providing education and carrying out research responsibilities, only some faculty participation is reflected in the Training documentation.

INTERNAL AUDIT AND REPORTING SYSTEM
In accordance with 41 C.F.R. 60-2.17

The Health Center has developed and implemented an auditing system that periodically measures the effectiveness of its total AAP. The Health Center views the activities that are listed below as critical to the success of the AAP.

1. The Affirmative Action Officer will continue to monitor records of applicant flow, referrals, placements, rejected offers, training, transfers, promotions, terminations, and any layoffs or recalls to ensure that the Health Center's non-discriminatory policy is carried out. Procedures are reviewed and revised as problems are identified.
2. Top management is and will continue to be informed of any problems that arise in their respective areas so that immediate and appropriate steps can be taken to resolve any issues.
3. The Health Center recognizes its responsibility to affirmative action and is committed to fulfilling this responsibility by complying with all government regulations and laws pertaining to equal employment opportunity. As part of this commitment, management will be kept abreast of developments in the affirmative action area. The primary vehicle for communication with management will be periodic affirmative action briefings.
4. The Affirmative Action Officer will generate internal reports on a regular basis to evaluate the degree to which equal employment opportunity and organizational objectives are being obtained.
5. The Health Center will review report results with all levels of management as to the degree to which their affirmative action goals and compliance are being attained, and will design and implement corrective actions, including adjustments in programs, as needed.
6. Progress on the Health Center's AAP will be discussed at supervisors meetings, and relevant information will be communicated to employees during regular departmental meetings as appropriate.
7. The Affirmative Action Officer will periodically report to the VP for Health Affairs, Dean of Medical School of the Health Center and other appropriate top management on the effectiveness of the program and will submit recommendations for improvement.

CONCLUSION

The AAP Year, July 1, 2008 - June 30, 2009, shows a continued commitment to equal employment opportunity and affirmative action, and has strong plans to ensure both corporate and employee success.

Through its Affirmative Action Officer, Carolyn Lyle, the Health Center will continue to communicate its policies, both within the organization and to the community in which we work. The VP for Health Affairs, Dean of Medical School affords the Affirmative Action Officer full authority to take action to implement the plan and to pursue solutions to problems that might impede the progress of this plan.

At the close of University of Connecticut Health Center's most recent Plan year, an analysis of the composition of the workforce was undertaken. The workforce was analyzed by job group and by department to determine the employment of minorities and women, and to identify if placement goals are indicated when compared to the appropriate available workforce. This analysis revealed 13 areas in which the difference between incumbency versus estimated availability was statistically significant, showing that for the overwhelming majority of the workforce, employment levels of women and minorities are representative of our recruiting population. Nonetheless, the Health Center expects to continue its successful outreach efforts and to ensure that all applicants and employees are treated fairly, based on job-related criteria and without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.

The Health Center is mindful of the fact that continued achievements in the area of equal employment opportunity and affirmative action are important. As a result, we have included additional action-oriented plans and programs for recruiting, communication, and reporting, to ensure that our compliance with affirmative action continues in good stead.

Finally, it should be noted that the Health Center's thorough analysis of its workforce reveals that University of Connecticut Health Center is in full compliance with sex discrimination guidelines and that there is no evidence of discrimination in any form against female employees. As outlined in this AAP, University of Connecticut Health Center is ready and willing to make affirmative action both a commitment and a continued reality.

LIST OF EXHIBITS

Exhibit A - Policy of Affirmative Action Letter

Exhibit A
Policy of Affirmative Action Letter

Dear Outreach and Placement Professional:

This letter is to inform you that University of Connecticut Health Center is committed to the principles of equal employment opportunity. Moreover, as a government contractor bound by Executive Order 11246, University of Connecticut Health Center takes its affirmative action obligations very seriously. University of Connecticut Health Center states as its Policy of Affirmative Action the following:

- A. It will be the policy of University of Connecticut Health Center to recruit, hire, train, and promote persons in all job titles without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.
- B. All employment decisions shall be consistent with the principle of equal employment opportunity, and only job-related qualifications will be required.
- C. All personnel actions, such as compensation, benefits, transfers, tuition assistance, social and recreational programs, etc. will be administered without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.

To assure compliance with the Health Center's AAP, Carolyn Lyle, Affirmative Action Officer, has been designated to administer and monitor the Plan and make reports to Senior Management. Members of our Human Resources Department will contact you when positions are available. We request that you refer to us all qualified candidates, including women and individuals of color.