

University of Colorado Denver
Affirmative Action Plan
November 1, 2022 – October 31, 2023



Summary

Executive Summary

As part of the Office of Federal Contract Compliance Programs (“OFCCP”) requirements and the University’s affirmative action program, the University of Colorado Denver (“CU Denver”) is required to produce an annual Affirmative Action Plan (“Plan”). The purpose of the Plan is to provide campus leaders, managers, and employees with a comprehensive assessment, including statistical analysis, of our affirmative action efforts. The Plan is designed to identify employment goals, potential barriers to equal employment opportunities, and progress made toward meeting our goals. The Plan includes a set of required statistical reports that allow CU Denver to evaluate its workforce and determine areas where women, racial or ethnic minorities, veterans, and individuals with disabilities are underrepresented.

The current Affirmative Action Plan for the University of Colorado Denver includes 2,077 employees, including both faculty and staff. Minorities make up 25% of the workforce (517 employees), and women make up 58.4% (or 1,214 employees).

We identify areas of underrepresentation by placement goals. Placement goals are determined annually with respect to women and minorities by calculating differences between current workforce and estimated availability as defined by external labor markets and internal opportunities. If the difference is statistically significant, then a placement goal or area of underrepresentation is identified. Once identified, the campus is to make good-faith efforts to meet, where possible, those goals. Our placement goals for minorities and women for this Plan Year are as follows:

Job Group & Name	Minorities	Women
01-01: Senior Instructor	Yes	
01-02: Instructor	Yes	Yes
01-03: Clinical Professor/Assoc Professor (C/T)	Yes	Yes
01-05: Clinical Asst Professor/Instructor (C/T)	Yes	
01-08: Lecturer	Yes	
01-09: Other Instructional	Yes	Yes
02-01: Professor	Yes	Yes
02-02: Associate Professor	Yes	Yes
02-03: Assistant Professor	Yes	
03-02: Associate Professor - Research		Yes
03-07: Research Associate	Yes	
03-08: Post-Doctoral Fellow	Yes	

03-10: Other Research		Yes
14-01: Librarians	Yes	
16:02: Middle other Teaching and Instructional Support Occupancies	Yes	
16-03: Entry Other Teaching and Instructional Support Occupancies	Yes	
17-01: Executives	Yes	
17-02: Senior Managers/Directors	Yes	
17-02A: Senior Managers/Directors-Academia	Yes	
17-03: Managers/Directors	Yes	
17-03A: Managers/Directors/Academia	Yes	
18-01: Senior Business and Financial Operations	Yes	
18-03: Entry Business and Financial Operations	Yes	
19-01: Senior Computing, Engineering and Science	Yes	Yes
19-02: Middle Computer, Engineering, and Science	Yes	
19-03: Entry Computer, Engineering, and Science Professionals	Yes	
19-04: Senior Professional Research Assistant	Yes	
19-05: Professional Research Assistant	Yes	
20-03: Entry Community Service, Legal, Arts, and Media	Yes	
22-03: Entry Service Occupations	Yes	

Annually, the Affirmative Action Plan analyzes the applicant pools, hires, and promotions to determine whether significant underrepresentation exists in any of those categories. We also determine annually whether we have met the federally mandated hiring benchmark of 5.5% for protected veterans and the federally mandated utilization benchmark, which is 7%. For this Plan Year, 1% of our hires were veterans, falling short of the 5.5% goal. This year 3.4% of our employees have disclosed having a disability, falling short of the 7% goal but increasing by .04% over last Plan year.

Over the course of this Plan Year, CU Denver will focus on:

- Continuing on its ambitious goal to be the nation's exemplar equity-serving institution;
- Continued implementation of the Campus 2030 Goals; and

- Increasing targeted outreach to women and minority applicants.

Summary

Introduction

Signed into law by President Johnson in 1965, Executive Order 11246 requires federal contractors to adopt an affirmative action program. The program was designed for federal contractors to take “affirmative action” for the employment and advancement of qualified minorities. It also stated that discrimination based on a person’s race or ethnicity was unlawful. The “affirmative action” or “positive steps” a federal contractor was expected to take involved eliminating existing barriers to equal opportunity that disproportionately affected minorities. In 1967, similar affirmative action obligations were created with respect to women.

Today, affirmative action programs require federal contractors to apply affirmative action toward minorities, women, protected veterans, and individuals with disabilities. The focus should be on engaging in effective outreach efforts to attract, employ, and advance those underrepresented groups and eliminate barriers to their equal opportunity. The federal program also prohibits discrimination in employment decisions on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, veteran status, and disability. All of those characteristics are covered by the University of Colorado Law of the Regents Article 8, Part A., on Non-Discrimination. Article 8, Part A. also prohibits discrimination based on pregnancy, age, creed, gender expression, political affiliation, and political philosophy.

As part of the Office of Federal Contract Compliance Programs (“OFCCP”) requirements and the University’s affirmative action program, the University of Colorado Denver (“CU Denver”) is required to produce an annual Affirmative Action Plan (“Plan”). The purpose of the Plan is to provide campus leaders, managers, and employees with a comprehensive assessment, including statistical analysis, of our affirmative action efforts. The Plan is designed to identify employment goals, potential barriers to equal employment opportunities, and progress made toward meeting our goals. The Plan also includes a narrative description of CU Denver’s employment policies, practices, and procedures that support the goal of equal opportunity by fostering a diverse and inclusive community.

The Plan includes required statistical reports that allow CU Denver to evaluate its workforce and determine areas where women, racial or ethnic minorities, veterans, and individuals with disabilities are underrepresented. We accomplish this by conducting an analysis by race and gender in job categories within organizational units. To determine areas of underrepresentation, we compare the current workforce against estimates in relevant labor markets and internal advancement opportunities. If underrepresentation is identified, CU Denver is required to develop effective action plans and strategies, including outreach to and recruitment

of qualified minorities and women in order to achieve representation (aka “utilization”).

In addition to underrepresentation, the Plan analyzes data on applicants, hires, promotions, and separations to ensure there is no unintended disproportionate impact on race, ethnicity, or gender. This allows CU Denver to more closely identify potential barriers to equal employment opportunities and put strategies in place to help remove them.

The CU Denver Plan covers all permanent employment groups, including faculty, research faculty, clinical faculty, university staff, and classified staff. “Faculty” titles refer to tenure-track, non-tenure-track, and lecturer positions. Faculty with administrative roles, such as Dean or Vice Chancellor positions, are reported based upon their administrative appointment. Data on faculty and staff personnel, provided by the Office of Institutional Research, are reflective of November 1, 2022. Data on hires, promotions, and terminations (the plan transaction date range) were compiled for the period November 1, 2021, through October 31, 2022. The Plan date range implementation period is November 1, 2022, through October 21, 2023.

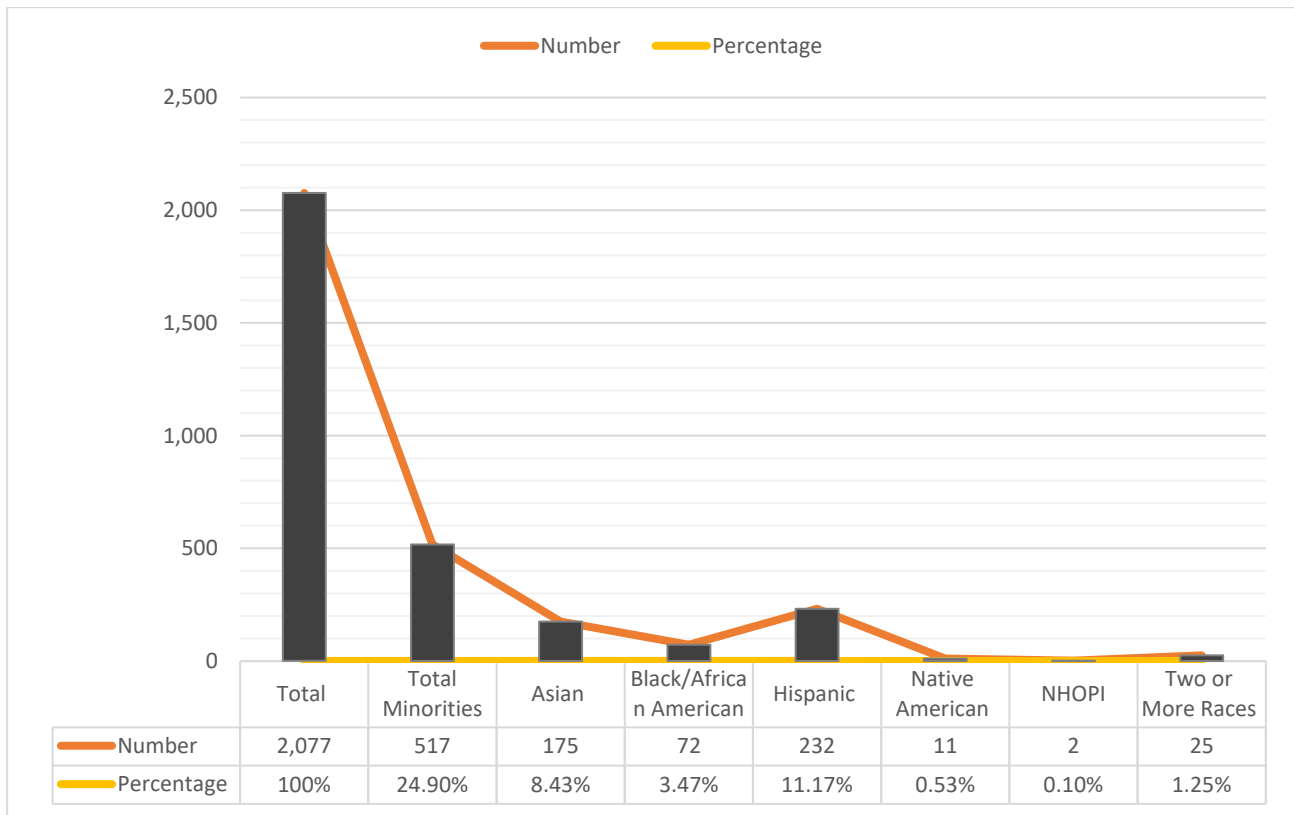
CU Denver’s Affirmative Action Officer is Teri Engelke, Assistant Vice Chancellor for Human Resources at the University of Colorado Denver. The AAP this year was created by Biddle Consulting Group.

Workforce Profile

The current Affirmative Action Plan for the University of Colorado Denver includes 2,077 employees, including both faculty and staff. Minorities make up 24.9% of the workforce (517 employees), and women make up 58.4% (1,214 employees).

“Minorities” includes employees who identified themselves as Black or African American, Asian, Hispanic, Native American, Asian, Native Hawaiian, and Other Pacific Islander (NHOPI), or Two or More. Where race data was missing for employees, they were characterized as “white” for purposes of this Affirmative Action Plan. While that likely underestimates the actual percentage of minorities, it avoids inadvertently masking potential underrepresentation of minorities. Similarly, all employees who did not disclose their sex were characterized as “male,” again to avoid inadvertently masking issues of underrepresentation of women.

Figure 1: CU Denver Workforce by Race



Placement Goals

We identify areas of underrepresentation by placement goals. Placement goals are determined annually with respect to women and minorities by calculating differences between current workforce and estimated availability as defined by external labor markets and internal opportunities. If the difference is statistically significant, then a placement goal or area of underrepresentation is identified. Once identified, the campus is to make good-faith efforts to meet, where possible, those goals. Placement goals are not intended to be hiring quotas or set-asides for hiring those identified as being underrepresented.

Placement goals are identified by job group, which is a group of positions with similar job duties, responsibilities, opportunities, and compensation. A complete list of all job groups including job titles is available upon request. Job groups span schools, colleges, and departments across CU Denver.

The 2022-2023 affirmative action plan has identified a total of thirty job groups with placement goals, as shown below in Figure 2. Some job groups had a placement goal held over from the last plan year (discussed below). Other job groups had newly identified placement goals in this plan year.

Figure 2: CU Denver Placement Goals

	Job Group & Name	Minorities	Women
1	01-01: Senior Instructor	Yes	
2	01-02: Instructor	Yes	Yes
3	01-03: Clinical Professor/Assoc Professor (C/T)	Yes	Yes
4	01-05: Clinical Asst Professor/Instructor (C/T)	Yes	
5	01-08: Lecturer	Yes	
6	01-09: Other Instructional	Yes	Yes
7	02-01: Professor	Yes	Yes
8	02-02: Associate Professor	Yes	Yes
9	02-03: Assistant Professor	Yes	
10	03-02: Associate Professor - Research		Yes
11	03-07: Research Associate	Yes	
12	03-08: Post-Doctoral Fellow	Yes	
13	03-10: Other Research		Yes
14	14-01: Librarians	Yes	
15	16:02: Middle other Teaching and Instructional Support Occupancies	Yes	
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18	17-02: Senior Managers/Directors	Yes	
19	17-02A: Senior Managers/Directors-Academia	Yes	
20	17-03: Managers/Directors	Yes	
21	17-03A: Managers/Directors/Academia	Yes	
22	18-01: Senior Business and Financial Operations	Yes	
23	18-03: Entry Business and Financial Operations	Yes	
24	19-01: Senior Computing, Engineering and Science	Yes	Yes
25	19-02: Middle Computer, Engineering, and Science	Yes	
26	19-03: Entry Computer, Engineering, and Science Professionals	Yes	
27	19-04: Senior Professional Research Assistant	Yes	
28	19-05: Professional Research Assistant	Yes	

	20-03: Entry Community Service, Legal, Arts, and Media	Yes	
	22-03: Entry Service Occupations	Yes	

Applicants

One way we can effectively measure outreach efforts is to examine the demographics of the applicant pools. Annually, the Affirmative Action Plan analyzes the applicant pools to identify any potential barriers to equal opportunity in the hiring process and determine if outreach efforts have been successful in increasing the number of qualified minorities and women. Moreover, applicant pools are compared with candidate “selections” to identify where differences in rates of hire may exist. Selections from the applicant data include all applicants (external and internal) that have been hired or offered a position for employment within our applicant tracking system, Taleo.

Figure 3 shows the applicant pool and selections derived from data for this Plan year. Individuals who failed to meet minimum qualifications or withdrew from consideration were excluded from analysis.

Figure 3: CU Denver Applicant Analysis

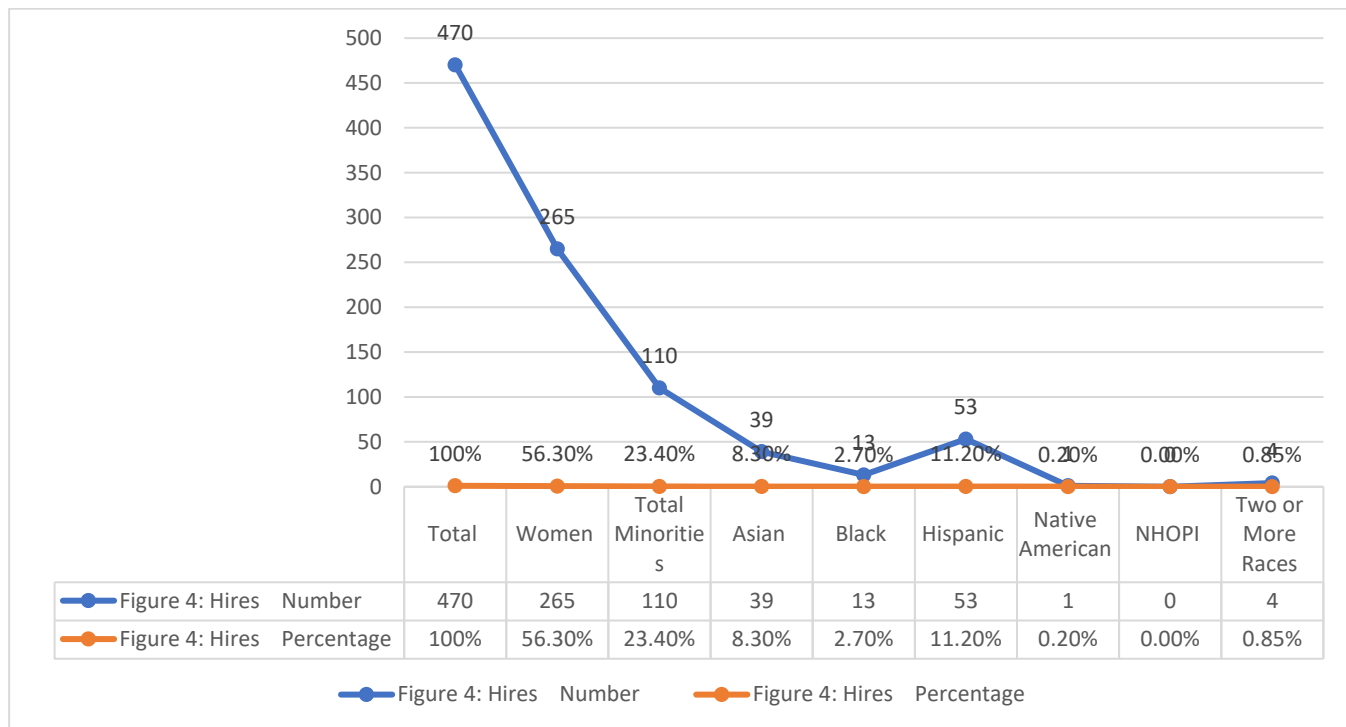
	Pool	Selection Rate
Total	1461	N/A
Women	54%	56.38%
Total Minorities	34.7%	23.4%
Asian	12.4%	8.3%
Black	5%	2.8%
Hispanic	14%	11.2%
Native American	0.3%	0.21%
NHOPI	0.2%	0%
Two or More Races	2.7%	0.85%

Minorities in the applicant pool for this Plan year (34.7%) increased compared to the previous Plan year (26.2%). Women in the applicant pool remained steady from last Plan year to this Plan year (54% and 54%, respectively) with their selection rate decreasing by decreased about 2% from last Plan year.

Hires and Promotions

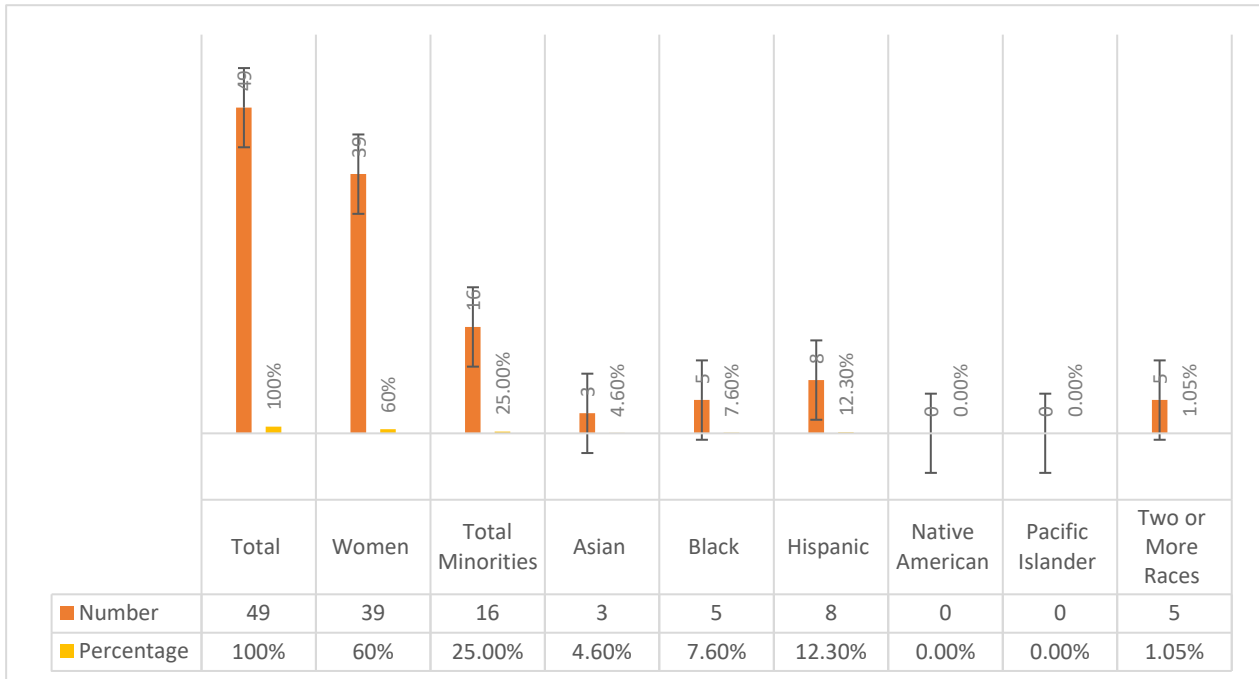
The next two figures (Figure 4 and Figure 5) show the breakdown of hires and promotions. “Hires” includes both new hires and rehires of faculty and staff. “Promotions” are movements of current employees into new positions that reflect an increase of compensation, responsibilities, and opportunities.

Figure 4: CU Denver Hires



Hires of minorities increased from an N=24 (30.77%) from last Plan year to an N=110 (23.4%) for this Plan year. The increase in women hires for this plan year was N=265 or 56.3% versus last Plan year of N=46 or 58.97%.

Figure 5: CU Denver Promotions

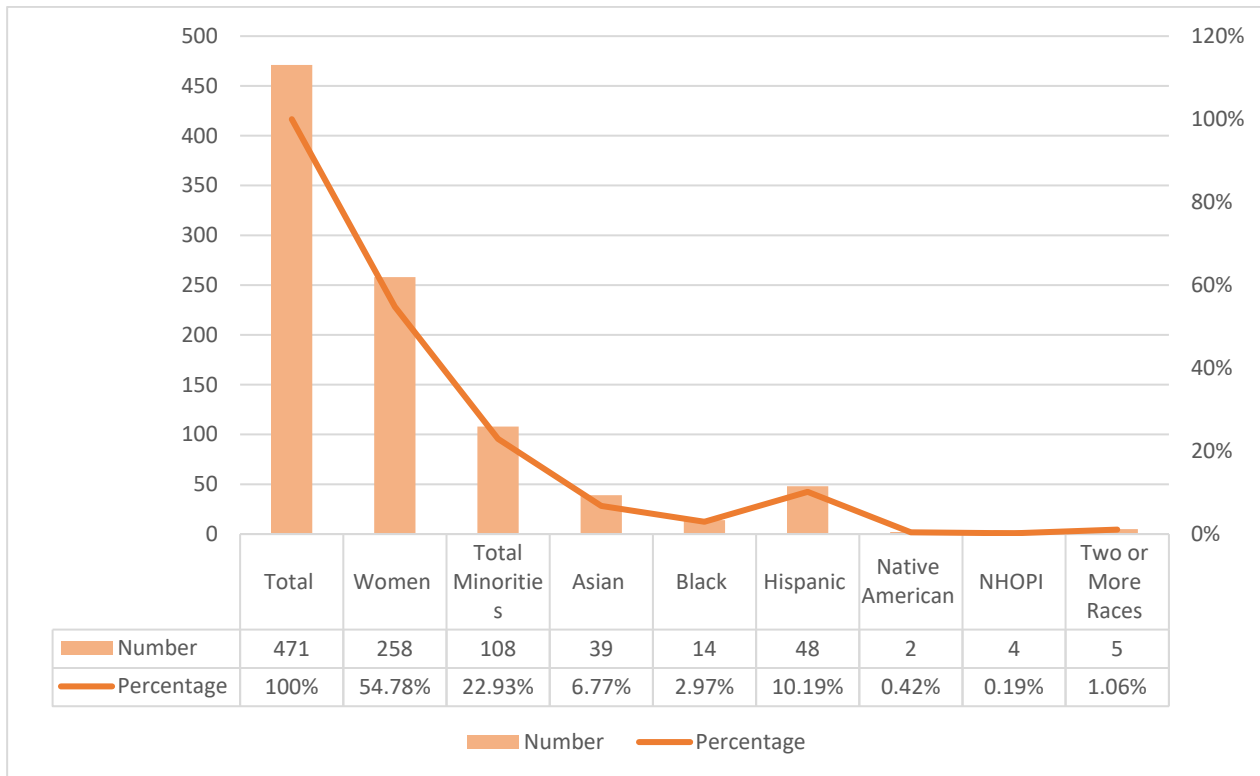


Promotions for women at CU Denver increased by approximately 8% from the previous Plan Year, and promotions of minorities remained static (at 25%) for this and last Plan year.

Separations

Data on separations provide us with information about CU Denver’s retention efforts. Retention rates are indicative of whether CU Denver is welcoming and inclusive once a hire is made. Many times, understanding why an employee decides to leave an employer is difficult. Capturing data on race and sex, however, can allow us to determine if certain groups are leaving at a higher rate than other groups and how those rates compare to hires and promotions.

Figure 6: CU Denver Separations (Voluntary & Involuntary)



Compared to last Plan year, separations for women increased by just over 5% and at about 1% for all minorities.

Protected Veterans

National Annual Veteran Hiring Benchmark [?](#)

National Percentage of Veterans

Effective Date Range	National Percentage of Veterans in the Civilian Labor Force
03/31/2023 -	5.4%
03/31/2022 - 03/30/2023	5.5%
03/31/2021 - 03/30/2022	5.6%
03/31/2020 - 03/30/2021	5.7%

Data from the VEVRAA Benchmark Database

The agency that oversees affirmative action obligations for federal contractors just released its 2023 Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA) hiring benchmark. Effective March 31, the new benchmark is 5.4%, which is a slight decrease from the 2022 benchmark of 5.5%. Contractors required by the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA) to develop a written affirmative action program (AAP) must also establish a hiring benchmark for protected veterans every year, or adopt the national benchmark provided by the Office of Federal Contract Compliance Programs (OFCCP) each year, as part of their AAP update. Under either approach, contractors are required to compare the percentage of hires who are protected veterans in each of their written AAPs to the hiring benchmark set for that AAP.

Similar to the placement goals for women and minorities, if the benchmark VEVRA goal is not met, CU Denver must engage in effective outreach efforts to attract and employ protected veterans. For this Plan Year, 1.3% of our hires were veterans, falling short of the 5.5% goal. As with the placement goals for women and minorities, this benchmark is not a quota or set-asides for hiring protected veterans. The University of Colorado Denver continues to make a concerted effort during this Plan year to recruit more veterans for employment.

Individuals with Disabilities

The Section 503 AAP regulation at 41 CFR 60-741.45 requires that contractors annually analyze their utilization of individuals with disabilities against the 7% aspirational goal established by the OFCCP. This goal serves as an equal opportunity objective that should be attainable by taking the affirmative actions required in the Section 503 regulations. For an AAP to be considered acceptable, it must include the annual utilization goal analysis.

If the percentage of individuals with disabilities in one or more job groups, or a contractor's entire workforce for smaller companies, is less than the 7% utilization goal, then the contractor (CU Denver) must determine whether and where barriers to EEO exist. To identify any such problems, contractors must assess personnel processes, the effectiveness of its outreach and recruitment efforts, the results of its AAP self-audit, and any other areas that might influence the success of the AAP. When a contractor finds problem(s), it must develop and implement action-oriented programs to correct them such as modifying personnel processes or taking a different approach for outreach and recruitment.

This year 2.5% of our employees have disclosed having a disability, falling short of the 7% goal but increasing from last Plan year by .06. While the 7% goal is not a quota or set-aside, it is the benchmark set by the federal government for which federal contractors are to aim. Our utilization rate is likely inaccurate, as it is probable that many employees with disabilities have not disclosed their disability status to the University. Over the course of the Plan Year, the University of Colorado Denver will work to encourage employees to disclose their disability status if they so choose.

It is noteworthy that in late 2021, the [University of Colorado Denver surveyed its entire employee population](#). The response rate for the campus combined employee categories was 2,171/4,505 for faculty (48%) and 1,242/5650 for staff (22%). When asked questions about disability needs, 58% of all staff (including faculty) indicated having a chronic mental health condition such as depression, PTSD and/or anxiety, 33% indicated having a chronic medical condition such as cystic fibrosis, diabetes or chronic pain), 23% indicated having a learning disability or ADHD, 10% indicated having a mobility or sensory disability such as prosthetic, spinal cord injury, heard of hearing and 9% indicated having another disability or chronic condition. The higher percentages of staff self-reporting disability and conditions suggest that CU Denver would benefit from reviewing how it is implementing Section 503 of the Rehabilitation Act requiring covered federal contractors to invite applicants to voluntarily self-identify as an individual with a disability during the pre-offer and post-offer phases of the application process, and to invite employees to self-identify every five years.

Initiatives for the Future

CU Denver is committed to building an environment that embraces inclusive excellence where diversity can thrive. With that in mind, we remain focused on meeting compliance obligations under affirmative action requirements designed to increase the representation of women, minorities, protected veterans, and individuals with disabilities, while respecting equal opportunity for all protected classes. To achieve success, we recognize the need for self-assessment, accountability, and commitment to making necessary good-faith efforts.

Over the course of this Plan Year, CU Denver will focus on:

- Continuing to ensure that all Search Committee Guidelines (Officers, Faculty, and Staff) include specific expectations with respect to equal opportunity, including:
 - becoming aware of and avoiding unconscious biases;
 - discussing perceived biases openly, and as they occur;
 - expecting that all committee members work toward the goal of enhancing diversity; and
 - expecting that members of underrepresented groups are not to be solely responsible for identifying candidates in this regard.
- Continuing to encourage search committees to ask a question intended to explore the candidates' opinions about, and commitment to, diversity and inclusion.
- Continue to revise, as appropriate policies, bylaws and promotion and/or tenure criteria to include recognition of work that supports belonging and inclusion.
- Continue to post job openings in diverse spaces, such as HBCUs and other diverse-focused organizations.
- Periodically examine HR processes and voluntary self-identification forms.
- As necessary, continue to include job description templates for University Staff that are modified to include a competency focus on a commitment to the principles of diversity and inclusion.
- Periodically examine HR processes and voluntary self-identification forms.
- Continue collaboration between the campus Human Resources Office and the Office of the Vice Chancellor for Diversity, Equity, and Inclusion, who jointly lead the driving and the development of initiatives that build on and advance CU Denver's commitment to equity and justice. An example that emerged from this partnership is the Affirmative Action Resource Toolkit to assist search

committee chairs and members, as well as hiring authorities and HR business partners, in increasing DEI efforts in recruiting and hiring.

- Collaborate with campus equity leaders to ensure achievable goals for the appointment of women and minority faculty and staff members.
- Continue to monitor implementation of the CU Denver's 20230 established strategic initiatives. As those recommendations are adopted by campus leadership, they will be included in future AAPs.
- Collaborate with campus equity leaders, Deans, Managers, Directors and Campus Executives to ensure achievable goals for the appointment of women and minority faculty and staff members.