

University of Colorado Denver
Affirmative Action Plan
November 1, 2023 – October 31, 2024



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 2026 employees, including both faculty and staff. Minorities make up 25% of the workforce (502 employees), and women make up 58.8% (or 1,193 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	Minority	Women
1	01-01 - Senior Instructor	Yes	
2	01-02 - Instructor	Yes	
3	01-03 - Clinical Professor/Assoc Professor (CT)	Yes	
4	01-05 - Clinical Assistant Professor/Instructor (C/T)	Yes	
5	01-08 - Lecturer	Yes	
6	01-10 - Working ORP/PERA Retiree - Faculty	Yes	
7	02-01 - Professor	Yes	Yes
8	02-02 - Associate Professor	Yes	Yes
9	02-06 - Assistant Professor - Clinical	Yes	Yes
10	03-02 - Associate Professor - Research		Yes
11	03-03 - Assistant Professor - Research	Yes	
12	03-04 - Research Senior Instructor	Yes	
13	03-07 - Research Associate	Yes	
14	17-02 - Senior Managers/Directors	Yes	
15	17-02A.- Senior Managers/Directors Academia	Yes	Yes
16	19-01 - Senior Computer, Engineering, and Science Professionals	Yes	
17	19-04 - Senior Professional Research Assistant	Yes	
18	20-01 - Senior/Middle Community Service, Legal, Arts, and Media	Yes	
19	20-03 - Entry Community Service, Legal, Arts, and Media	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, 1.5% of our hires were veterans, falling short of the 5.5% goal, but increasing .5% over last Plan year. This year 3.9% of employees hired have disclosed having a disability, falling short of the 7% goal, but increasing by .5% over last Plan year.

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

- Continuing its ambitious goal to be the nation’s exemplar equity-serving institution;
- Continued implementation of the Campus 2030 Goals; and
- Increasing focused 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.

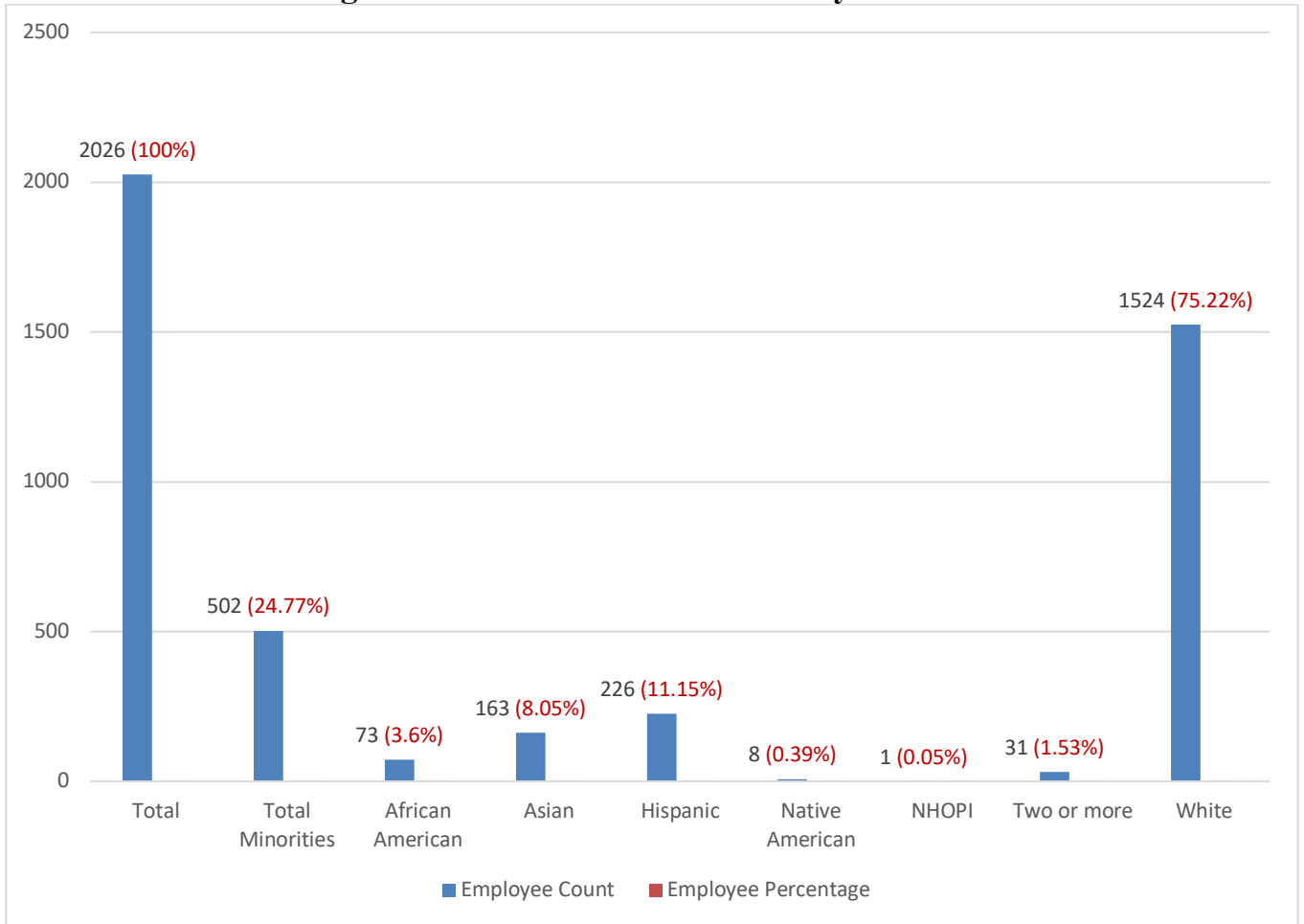
The CU Denver Plan covers all permanent employment groups, including faculty, research faculty, clinical faculty, university staff, and classified staff. “Faculty” titles refer to tenure-track, non-tenure-track, and lecturer positions. Faculty with administrative roles, such as Dean or Vice Chancellor 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, 2023. Data on hires, promotions, and terminations (the plan transaction date range) were compiled for the period November 1, 2022, through October 31, 2023. The Plan date range implementation period is November 1, 2023, through October 21, 2024.

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 2,026 employees, including both faculty and staff. Minorities make up 24.77% of the workforce (502 employees), and women make up 58.88% (1,193 employees). “Minorities” includes employees who identified themselves as Black or African American, 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	Minority	Women
1	01-01 - Senior Instructor	Yes	
2	01-02 - Instructor	Yes	
3	01-03 - Clinical Professor/Assoc Professor (CT)	Yes	
4	01-05 - Clinical Assistant Professor/Instructor (C/T)	Yes	
5	01-08 - Lecturer	Yes	
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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

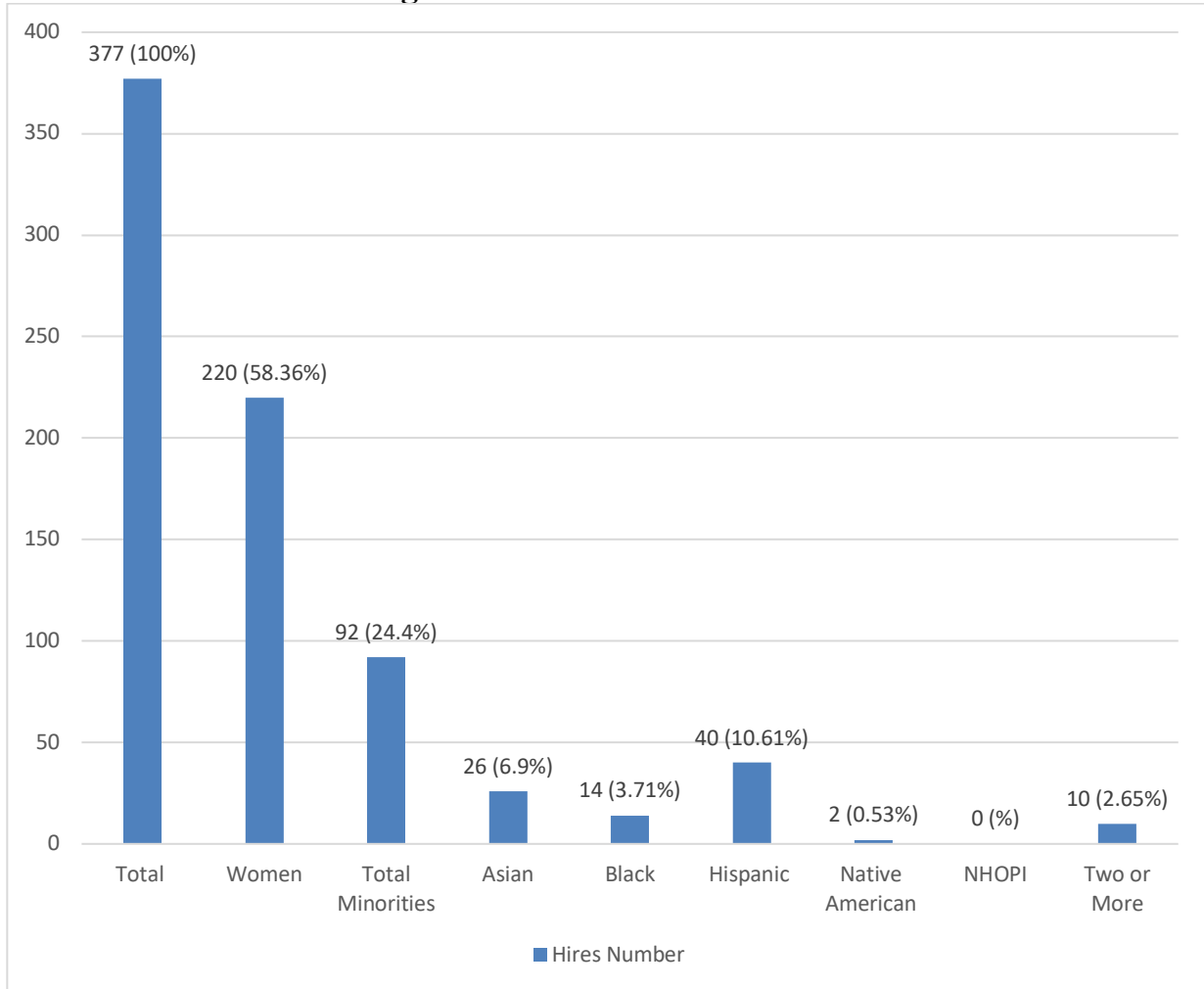
	Pool	Selection Rate
Total	1861	N/A
Women	57.60%	58.36%
Total Minorities	37.57%	24.4%
Asian	10.05%	6.9%
Black	7.63%	3.71%
Hispanic	16.23%	10.61%
Native American	0.86%	0.53%
NHOPI	.11%	0%
Two or More Races	2.69%	2.65%

Minorities in the applicant pool for this Plan year (37.57%) increased compared to the previous Plan year (34.7%). Women in the applicant pool increased from last Plan year to this Plan year (54% and 57.6%, respectively) with their selection rate increasing by 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.

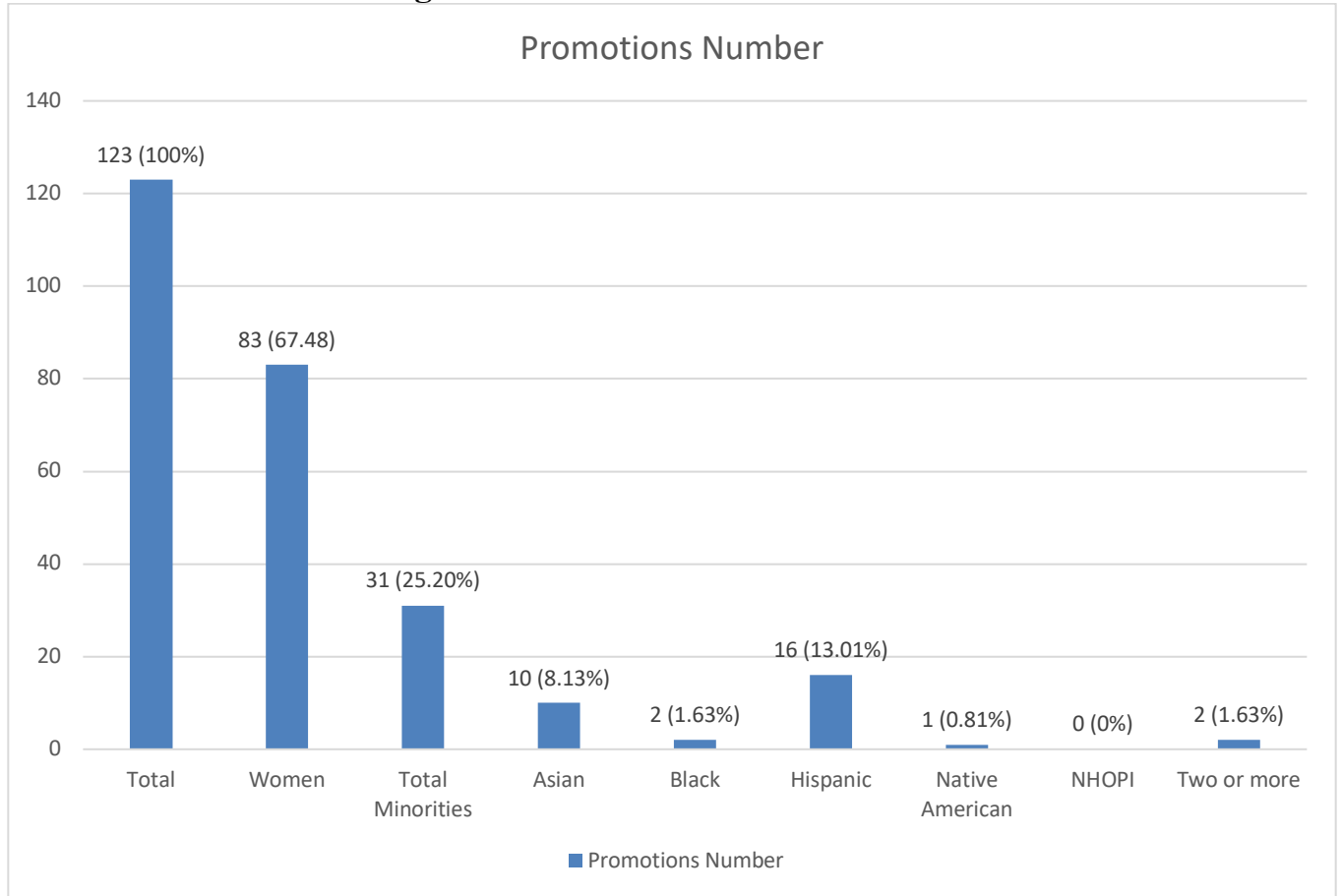
Figure 4: CU Denver Hires



CU Denver Hires	Total	Women	Total Minorities	Asian	Black	Hispanic	Native American	NHOPI	Two or More
Hires Number	377	220	92	26	14	40	2	0	10
Hires Percentage	100	58.36%	24.40%	6.90%	3.71%	10.61%	0.53%	0%	2.65%

CU Denver saw a decrease of 93 in total hires for this plan year. Hires of minorities decreased from N=110 (23.4%) from last plan year to an N=92 however our minority hire percentage increased to (24.4%) for this Plan year. There was a decrease of 45 for women hires from last plan year (N=265 or 56.3%) versus this Plan year of (N=220) however the percentage of women hired increased to 58.97%.

Figure 5: CU Denver Promotions



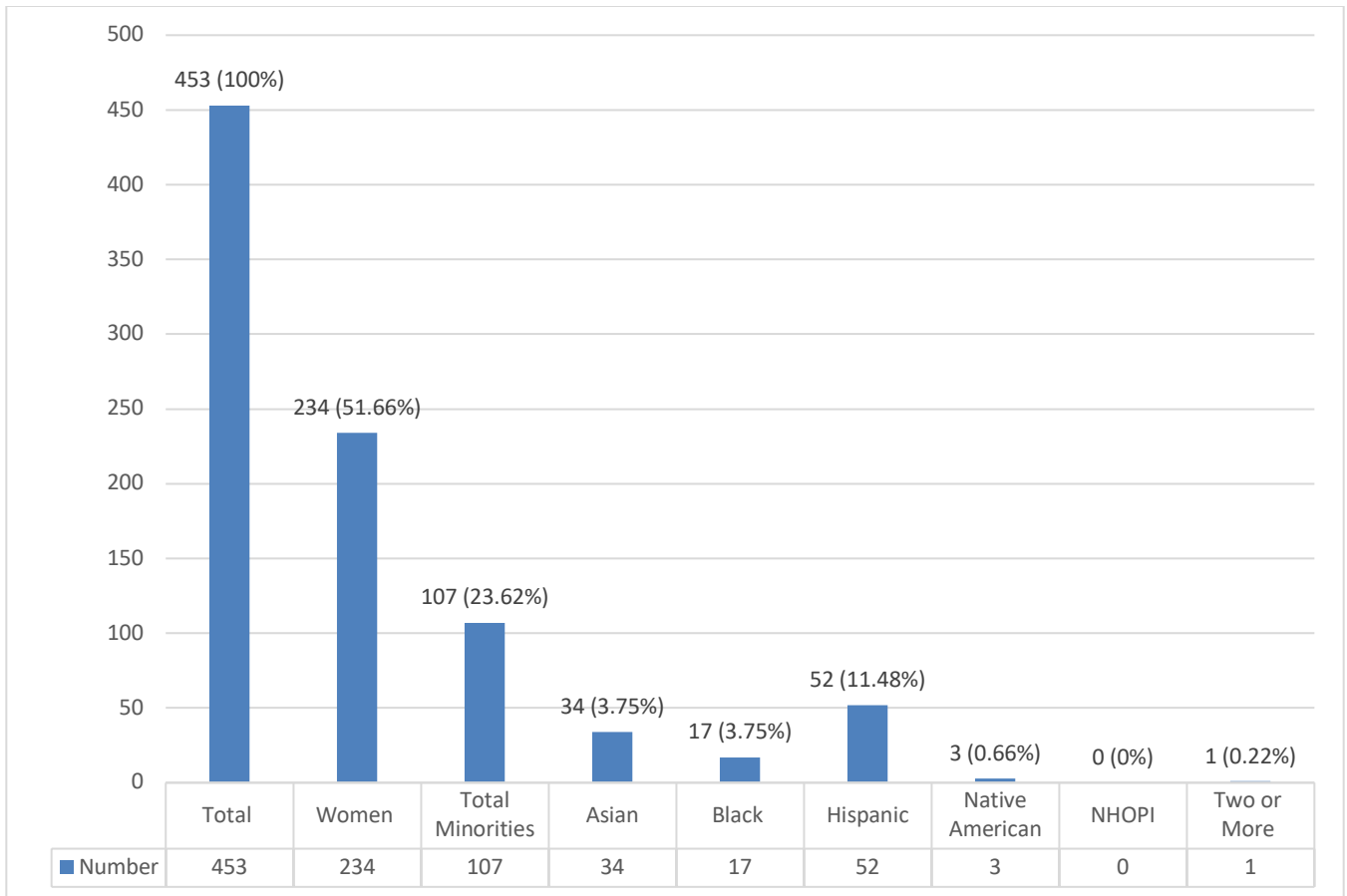
	Total	Women	Total Minorities	Asian	Black	Hispanic	Native American	NHOPI	Two or more
Promotions Number	123	83	31	10	2	16	1	0	2
Promotions Percentage	100%	67.48	25.20%	8.13%	1.63%	13.01%	0.81%	0.00%	1.63%

Promotions for women at CU Denver increased by 7.48% from the previous plan Year, and promotions of minorities increased by .2% for this 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 decreased by 3.1% and increased by 0.7% 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
03/31/2024-	5.20%
03/31/2023-03/30/2024	5.40%
03/31/2022-03/30/2023	5.50%
03/31/2021-03/30/2022	5.60%

The agency that oversees affirmative action obligations for federal contractors just released its 2024 Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA) hiring benchmark. Effective March 31, the new benchmark is 5.2%, which is a slight decrease from the 2023 benchmark of 5.4%. 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, 1.5% of our hires were veterans, falling short of the 5.5% goal, this is a .2% increase in hires from last plan year. 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 3.9% of our employees have disclosed having a disability, falling short of the 7% goal but increasing from last Plan year by .5%. 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.

Initiatives for the Future

Schools, Colleges, and Departments across CU Denver engage in the following practices to increase recruitment and hiring of women and minority candidates.

- Search committees include a wide representation of individuals with varied backgrounds. All members of search committees are required to complete an online training (“Search Committee Training: Inclusive Recruiting Practices”), which addresses the expectations of committee members with respect to equal opportunity and includes a module on “Search Committee Training: Inclusive Recruiting Practices,” and “Faculty Diversity Search and Hiring Committee Guidance” which were updated in 2023 and 2020 respectively.
- 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.
- To support search committee processes and deliberations, HR staff (from the central office and in the schools, colleges, and departments) have the ability to run applicant reports throughout the process, which include non-identifying EEO status for each candidate, and facilitate discussions on how to source and attract diverse candidates.
- Many search committees ask a question intended to explore the candidates’ opinions about, and commitment to, diversity and inclusion. CU Denver HR has created a list of diversity and inclusion questions that is available to each search committee, as well as a rubric to help search committee members evaluate answers to those questions.
- Job description templates for University Staff have been modified to include a competency focused on a commitment to the principles of diversity and inclusion.
- All job openings are posted to a variety of websites that target diverse candidates through Direct Employees Association, which is a clearinghouse service that “scrapes” job postings from the CU website daily and posts to various websites, including but not limited to: AfricanAmericanJobsite.com; AsianAmericanjobsite.com; Diversityworkers.com; HispanicJobsite.com; Jobs4Women.net; MinorityJobsite.com; usa.jobs Diversity; WomenforHire; CU Denver will continue to use Direct Employees services, in addition the university will use Job Elephant, which operates similarly to Direct Employees services.
- Direct Employers Association also posts all openings from the CU website to many colleges and universities, including the following: Historically Black Colleges and Universities (HBCUs); Alabama State University; Albany State University; Alcorn State University; Bowie State University; Central State University; Cheyney University of Pennsylvania; Delaware State University, Fayetteville State University; Florida Memorial University; Gadsden State Community College, Grambling State University; Hampton University; Howard University; Jackson State University; Johnson C. Smith University; Morehouse College; Morgan State University; Norfolk

State University; Shaw University; Southern University; Spelman College; Trenholm State Technical College; Tuskegee University; University of Arkansas at Pine Bluff; Virginia State University; Virginia Union University; West Virginia State University; Wilberforce University; Xavier University of Louisiana; and Tennessee State University.

- In addition to the aforementioned HBCUs, the list of college and universities where Direct Employers Association posts all openings from the CU website includes the following women's (or predominantly women's) colleges and universities. Barnard College; Bay Path University; Bryn Mawr College; Chatham University; College of St. Benedict; Columbia College (South Carolina); Mills College; Mount Holyoke College; Mount St. Mary's University; Russel Sage College; Scripps College; Smith College; Spelman College (also an HBCU listed above); Trinity Washington University; and University of St. Joseph.
- Training is made available through the CU Denver HR, online through CU Denver's learning management system Skillsoft, or by request to search committees, and any member of the University community, on unconscious bias.
- Training and tools focused on understanding differences, acceptance, communication, inclusion, respect, dignity, and transparency are offered, including: Cultural Sensitivity; Crucial Conversations; Difference Matters; Safe Zone Training (LGBTQ); Diversity and Cultural Competency; Building a Respectful Workplace; Addressing General Differences; Discrimination and Sexual Misconduct; Gender and Communication; Understanding Differences; and DiSC and MBTI Personality Assessments.
- The University sponsors staff and faculty community volunteer activities to broaden campus visibility in the local community, including at food banks, community gathering places, homeless shelters, and drop-in centers for vulnerable populations.
- All non-executive job openings remain open for more than three days are posted on ConnectingColorado.com
- Every job posting on the University's online application system contains the University's Regent Law Article 8, Part A (Conduct of the Members of the University Community, Nondiscrimination) at the bottom of the page: "The University of Colorado does not discriminate on the basis of race, color, national origin, sex, age, pregnancy, disability, creed, religion, sexual orientation, gender identity, gender expression, veteran status, marital status, political affiliation, or political philosophy." That language is followed by the statement that "All qualified individuals are encouraged to apply."
- Every job posting also contains the following EEO language; "The University of Colorado Strongly supports the principle of diversity. We encourage applications from women, ethnic minorities, persons with disabilities and all veterans. The University of Colorado is committed to diversity and equality in education and employment."
- CU Denver HR has resources to assist search committee chairs and members, as well as hiring authorities and HR business partners, to increase DEI efforts in recruiting and hiring. These resources include helpful information for before, during, and after the search, including job descriptions, posting open positions, developing interview questions, screening candidates, and more.

- The University of Colorado System created a Search Advocate program, approximately three years ago, to train employees to serve on search committees in order to ensure the integrity of the search process and mitigate biases that may result in unfair hiring processes. During the past three years, the System hosted Oregon State University to train cohorts of 35-40 employees from across the System twice per year. During that time CU Denver developed a network of search advocates on campus. This past year CU Denver HR created position to oversee the management of the search advocates including on-going learning opportunities, search scheduling and support. This plan year we will work to develop an in-house training program in order to alleviate the need for outside training.
- A revision to the Equity Task Force will occur this Plan year.
- In addition to the campus-wide initiatives, some schools, colleges, and departments have undertaken their own initiatives to increase diversity and inclusion within their units. For example, the School of Public Affairs (SPA) posts its faculty job openings to the following additional websites; Diverse Issues in Higher Education (aka Cox Matthews), Hispanic Outlook in Higher Ed, Journal of Blacks in Higher Ed, and the Chronicle of Higher Education's Diversity Lists postings. SPA HR also pulls a diversity report from the CU Careers system for each search to verify that there was a diverse applicant pool relative to the Denver area. SPA HR also works with hiring managers to modify minimum qualifications for staff positions to be more inclusive – for example, allowing professional experience to be substituted for a bachelor's degree. SPA has also created a Diversity Committee that regularly meets to discuss strategic goals, including Educating for Diversity and Inclusion, Increasing Diversity in Public Service, Recruiting for Diversity, Creating an Inclusive Culture, and Partnering for Diversity and Inclusion in the Community.
- Similarly, the Business School posts its open faculty positions to the PhD Project site in an attempt to reach diverse candidates. Like SPA, the Business School also pulls a diversity report from CU Careers to verify a diverse applicant pool.
- The College of Liberal Arts and Sciences and the School of Education and Human Development have created faculty appointments related to diversity and inclusion, including Assistant or Associate Deans for Diversity and Inclusion.
- We are fully in compliance with Colorado's Equal Pay for Equal Work Act. Further, we continue to review updates to the law to not only remain in compliance with the law but ensure that we review compensation best practices for equity, compression, and market.

Job Advancement:

1. Minority and female employees can be made available for participation in Career Days and related activities in the community, as desired.
2. CU Denver will continue to post or announce job opportunities.
3. CU Denver will continue to make use of the inventory of our current employee skills, when completed, to determine academic, skill, and experience level of individual employees.

4. Establish, whenever feasible, formal career counseling programs to include attitude development, education, aid, job rotation, buddy system, and similar program.
5. Require supervisory personnel to submit justification when qualified minority or female employees are passed over for upgrading.
6. Review seniority practices to ensure such practices are non-discriminatory and do not have discriminatory effect.
7. Encourage all employees to participate in facilities and company-sponsored social and recreational activities.
8. CU Denver will continue to use our formal employee evaluation program. The performance Appraisal is used for annual reviews for all employees.
9. All promotions are reviewed for qualifications, if requested promotions and job changes are greater than 50% change of job duties they are required to be posted for recruitment open to the campus community.