

## **DISCRIMINATION COMPLAINT PROCESS**

*(Section 46a-68-89)*

October 2016

This section contains information on UConn Health's system to resolve allegations of discrimination and discriminatory harassment and is consistent with Chapters 67 and 68 of the Connecticut General Statutes. This section was found to be in compliance in the previous filing and the proposals/recommendations were: The telephone numbers for the most commonly used civil rights enforcement agencies should be included in the complaint process. Included in our complaint process are the telephone numbers for the most commonly used civil rights enforcement agencies. Please see **Exhibit #1**.

UConn Health's Office of Institutional Equity has been merged with the University of Connecticut's Office of Institutional Equity located in Storrs, Connecticut. All investigative staff report to the Director of Investigations and Deputy Title IX Coordinator, as well as the Associate Vice President/ADA Coordinator/Title IX Coordinator.

### **Subsection (a)**

The Office of Institutional Equity (OIE) (formerly the Office of Diversity and Equity) is UConn Health's neutral unit responsible for managing internal investigations and resolutions for employees, students and patients who believe they have been subjected to discrimination or discriminatory harassment. OIE investigates all complaints of discrimination, gathers and evaluates evidence submitted by all parties, and renders a determination based on the preponderance of the evidence presented in order to mitigate harm resulting from any discriminatory conduct within UConn Health and/or to prevent its recurrence. UConn Health's Discrimination Complaint Procedures provide for the expeditious resolution of complaints to assure the legal options for filing complaints with enforcement agencies are not foreclosed. Please see **Exhibit #1**.

(1) The Associate Vice President, Director of Investigations, Associate Director of Investigations, EEO Investigator(s), and Paralegal/Legal Administrators are UConn Health's Affirmative Action Officers who investigate internal discrimination and discriminatory harassment complaints. With the exception of one EEO investigator who was hired during the plan year, the investigative staff has completed the required training provided by the Connecticut Commission on Human Rights and Opportunities (CHRO) and the Permanent Commission on the Status of Women (PCSW) as designated in Public Act 03-151 and 12-78, including the "Foundations" training and the bi-annual mandatory Equal Employment Opportunity/Attorney General Designee training in June 10, 2015 and June 16, 2015. The remaining EEO Investigator is registered to receive the "Foundations" training on October 25, 2016. Please see **Exhibit #2**.

(2) As part of the UConn Health's Discrimination Complaint Procedures, OIE provides assistance with informal resolution procedures for all parties involved in an internal investigation of alleged discrimination. The Employee Assistance Program serves as a neutral resource that provides confidential and informal assistance to UConn Health employees and is available to employees involved in an internal investigation of alleged discrimination.

(3) UConn Health's Discrimination Complaint Procedures are available through OIE's website: [www.equity.uconn.edu/discrimination/](http://www.equity.uconn.edu/discrimination/).

(4) All parties involved in an internal investigation of alleged discrimination are informed of and guaranteed protection from retaliation. **Exhibit #3.** This protection and guarantee will continue to be a provision of UConn Health's Discrimination Complaint Procedures and any revised set of procedures.

(5) All parties involved in an internal investigation of alleged discrimination or discriminatory harassment are advised of their legal options to file complaints with the Connecticut Commission on Human Rights and Opportunities; United States Equal Employment Opportunity Commission; United States Department of Labor, Wage and Hour Division; and any other agencies, state, federal or local, that enforce laws concerning discrimination in employment. These legal options are also listed in the UConn Health's Discrimination Complaint Procedures, which includes a list of the "Most Commonly Used Civil Rights Agencies," and is provided to all parties. The addresses of these agencies can also be accessed through OIE's web site, <http://equity.uconn.edu/discrimination/complaint-procedures>.

(6) UConn Health's Discrimination Complaint Procedures provide timelines, not exceeding ninety (90) days, for the filing, processing, and resolution of all complaints of discrimination and discriminatory harassment.

#### **Subsection (b)**

All records of internal complaints of discrimination and dispositions thereof are maintained and reviewed on a regular basis by OIE to detect patterns in nature of the alleged complaints. In addition, OIE provides regular reports to the Chief Executive Officer and Executive Vice President for Health Affairs, and other senior executives.

#### **Subsection (c)**

A summary of all complaint activity, the results thereof and the length of time required to resolve the alleged matters for this reporting period (July 1, 2015 – June 30, 2016) immediately follows this section. For those matters not resolved within ninety (90) days, those matters generally included the need to interview copious witnesses, the filing of amended complaints, the naming of additional Respondents, and/or calendar conflicts. As required, this summary references allegation that have resulted in complaints to external enforcement agencies, the number of such complaints, investigating agency, and whether the matter is currently pending or the outcome thereof. All records relevant to employee internal complaints of discrimination are maintained by OIE for examination by the Commission. Please see **Exhibit #4.**