

Good afternoon

My name is debi freund and I am the director of equal opportunity and diversity for the state department of children and families, as well as the president of the Connecticut association of affirmative action professionals.

I am here today regarding bill 1048 – concerning the investigation of a discrimination complaint against or by an agency head or state commission or board member. The intent of the bill is commendable – since by statute affirmative action personnel report directly to agency heads, no person should be called upon to investigate charges against the very person they report to. For the complainant – the person who filed the discrimination complaint - the integrity of the investigation would always be called into question as they would never feel that the investigation of their complaint had been done without bias. For the agency head or board member, a finding of nondiscrimination would always be suspect and general disbelieved; and finally, for the affirmative action professional they would be put into the untenable position of investigating the person who is responsible for their annual performance appraisal. This is not a good situation for any one.

I am here today however with concerns about a single word that has been added to this bill.

I call your attention to paragraph 4. In the original bill, the language read, "Each person designated by a state agency, department, board or commission as an affirmative action officer shall be responsible for investigating all complaints of discrimination ..." Under the proposed bill, the language would now read, "Each person designated by a state agency, department, board or commission as an affirmative action officer shall be responsible for investigating all internal complaints of discrimination ..."

I caution against using the phrase all internal complaints. The more appropriate phrase is the original , "all complaints of discrimination." We must not diminish the spirit and goals of affirmative action and equal opportunity. It must be acknowledged that affirmative action professionals have other complaints that they investigate –

case. But all too often, the affirmative action office may find concerns of disparate treatment while the ag designee (~~who wants to win~~) finds none. This results in the affirmative action investigation and its findings being discarded in the agencies attempts to win.

I have spoken with CHRO, and they have assured me that we will sit down together and take a look at these concerns. It is not that I am not in support of this bill – for I am. But I am concerned that some of the language could be misinterpreted, and further diminish^{ish} the regulations. What I am asking is that as it comes before you, you reexamine the language to clarify the intent. And I am confident that your intent is to uphold the spirit of the law and guarantee equal rights for all citizens of the state of Connecticut.

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W/ this proposed language change, it appears there would no longer be an internal investigation of a CHRO complaint. If this is taken away, the ^{complainant} ~~agency~~ no longer has the opportunity to ^{receive} provide a fair ^{& impartial} investigation. This also removes the agencies opportunity to resolve & mediate ^{CHRO} ~~the~~ complaints internally - which the purpose of the AA division which is part of the premise of the AA office by statute.