



BUILDING EXCELLENCE TOGETHER

CONSTRUCTION MANAGER // DESIGN-BUILDER // GENERAL CONTRACTOR

March 22, 2016

Re: SB 468

To Whom It May Concern:

This letter is regarding CHRO's response time to submitted Affirmative Action Plans. Per the Commission on Human Rights and Opportunities Website,

The Office of Diversity Programs of the Commission on Human Rights and Opportunities initially reviews and evaluates affirmative action plans submitted by executive branch state agencies. Staff recommend that a plan be approved, conditionally approved, or disapproved to the Commission. The Commission then formally approves or disapproves each affirmative action plan submittal by a majority vote of its members present and voting at a meeting. If the Commission fails to formally approve, conditionally approve or disapprove an affirmative action plan within ninety (90) days of the date such plan is filed, it is deemed to be approved by default.

Unable to meet this timeline, CHRO issued a temporary policy stating that they expanded the policy to 120 days. KBE, along with our subcontractors, have submitted multiple plans and the response time has exceeded the 120 days for CHRO to review/approve/disapprove. Our last approved plan exceeded 300 days. We are very concerned about the response time from CHRO as sometimes our projects are at the tail end before we have had any type of response from CHRO. We feel they are often hastily disapproved as multiple plans have inconsistent responses. This creates a large administrative burden as what is supposed to be a plan becomes a final document with no time to "cure" any deficiencies as the work is already complete. We are also told that without the ability to cure, we will be given "strikes" that will bar us from future State of Connecticut work.

As stated above, a timely response from CHRO is critical to the ability to moving forward with our projects in a way that meets the intent of the law in the most cost and administrative effective way.

Thank you for your time,

Susanne Donohue
VP, HR & AA/EEO Officer

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