

Shepard Steel Co., Inc.

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March 22, 2016

Sent Via Email

Judiciary Committee
State of Connecticut
300 Capital Avenue #2500
Hartford, CT 06106

Re: S.B. 468, An Act Concerning the Commission on Human Rights and Opportunities

Dear Sirs/Madams:

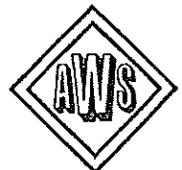
Shepard Steel Co., Inc. is a structural steel fabricator located here in Hartford, Connecticut who has been in business for 60 years, helping to build many important projects over the years. Due to the size of our contracts we are required to follow the Commission on Human Rights and Opportunities' (CHRO) Affirmative Action Plan program.

The 2% withholding of additional retainage (which is required while plans are being reviewed) has impacted our ability to re-invest in our company or has led to the need to borrow funds. This is mainly due to the delay in getting CHRO Affirmative Action Plans approved in a timely manner.

Therefore, we are in support of S.B. 468, which would require CHRO to review and formally approve, conditionally approve, or disapprove the content of a contractor's Affirmative Action Plan not later than 90 days following the date of submission of the plan to the commission. If the agency's executive director or the executive director's designee fails to act on the plan within 90 days, the plan shall be deemed to be approved.

Shepard Steel has had numerous Affirmative Action Plans that have not been approved on a timely basis, and for support I give you the following cases, and the final status:

	<u>Submitted</u>	<u>Reviewed</u>	<u>Final Status</u>
CREC Public Safety Academy H.S.	10/17/2012	3/5/2013	Not Approved or Closed
JM Wright Technical H.S.	6/26/2013	9/13/2014	Moved to Closeout
Achievement First Amistad H.S.	1/24/2014	3/2/2015	Moved to Closeout
ECSU Fine Arts Instructional Center	7/18/2014	1/8/2015	Disapproved



www.shepardsteel.com

We are an Affirmative Action/Equal Opportunity Employer

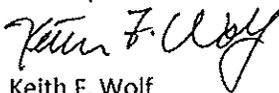
As an example of the impact of the 2% holding, on the ECSU Fine Arts project we have a contract value of approximately \$3,100,000, which led to the owner was holding an additional \$62,000 that should have been released in early 2015, but has not been released to date (expect release in April).

The last point of discussion regarding the CHRO's review of the Affirmative Action Plans is that they work to very specific guidelines that do not take into account the type of project that is being constructed. Consideration needs to be made for the requirements of the specifications of the architects and engineers. An example of this is that on one project the specifications called for the erector to be AISC certified, however there are only 2 Connecticut based MBE/WBE firms that have this certification. Our plan was rejected because we did not get 3 MBE/WBE bids on the project for that trade.

In summary, Shepard Steel supports the provision in S.B. 468 that would require CHRO to make a decision on a contractor's Affirmative Action Plan within 90 days.

Please consider the approval of S.B. 468 which will have a positive impact on the contractors in the State of Connecticut.

Sincerely,



Keith F. Wolf
Vice President