

## JUSTIFICATION

### HRO Representative (Housing Unit) 1 position

The CHRO is requesting to **re-fill one** HRO Representative positions in its Housing Discrimination Unit. At this time, this office only has three investigators. In order for there to be efficient, effective and responsible operation of each regional office, there must be, at a minimum **four (4)** investigators in this unit. The CHRO, pursuant to **Connecticut General Statutes Sections 46a-82, 46a-83 and 46a-84** has a statutory mandate to receive, investigate, prosecute and adjudicate complaints of discrimination in employment, housing, credit and public accommodations. The Connecticut General Statutes impose statutory timeframes in which various investigative tasks must be performed. The CHRO processes approximately **4000 complaints a year**. In order to meet the statutory mandate of investigating complaints in accordance with the Connecticut General Statutes, the CHRO must have sufficient HRO Representatives to perform investigative tasks. Investigative tasks include assisting an individual who has complained of discrimination with filing a complaint affidavit, serving the complaint, reviewing the complaint, answer, rebuttal and interrogatory responses and making an initial determination, engaging in mediation, conciliations and negotiations with the parties, noticing parties regarding investigation, conducting fact finding conferences, interviewing witnesses, reviewing current case law regarding the reasonable cause standard and writing up comprehensive findings of fact and making final investigative determinations and preparing reports. These tasks are time consuming, comprehensive and critical to the CHRO meeting its statutory mandates and timeframes. Since June of 2008, the CHRO has not been allowed to refill any position, and specifically has not been allowed to refill critical investigator positions once an investigator has retired or resigned from the agency.

The CHRO is the state equivalent to the Federal Civil Rights Agency, the Department of Housing and Urban Development (HUD). The CHRO has a work-sharing agreement with HUD which requires that the CHRO remain substantially equivalent with the EEOC. The CHRO receives federal funding from HUD for eligible cases that are filed and processed to closure. Currently, the rate of federal funding is the following: Up to \$2,000 per case closure if the case is closed within 100 days. The amount of money received decreases with the age of the case. If a case is not closed within 250 days, the CHRO can be reimbursed anywhere from \$0 to \$1,794. On average an investigator closes **45 cases** a year. The Commission **lost \$117,000** (45 x \$2,600) in federal funding this past year because this position was unfilled. The state stands to lose more federal funding in the upcoming year if the HRO Representative positions are not filled. Due to the federal funding for case intake and closure **over 100%** of an HRO Representative's salary and benefits is actually covered by Federal Funding. The federal money received from the HUD is deposited into the General Fund. Thus, the cost that the state must bare in order to meet its statutory mandates is 0% of the actual cost. Due to the shrinking resources of the Agency and the critical need for the additional HRO Representatives to investigate complaints of discrimination the services that the CHRO can provide to the general public are being diminished. Case processing times have been protracted, Complainants are dissatisfied with the state, due to processing times, and victims of illegal discrimination feel left with no recourse. Moreover, the cost to the business or landlord or

individual accused of discrimination increases the longer it takes to investigate a complaint which again diminishes the services being offered to the public.

## JUSTIFICATION

### HRO Representative (Waterbury Regional Office)

The CHRO is requesting to **re-fill four** HRO Representative positions in its Waterbury Regional Office. At this time, this office only has four investigators. In order for there to be efficient, effective and responsible operation of each regional office, there must be, at a minimum **eight (8)** investigators in each regional office. The CHRO, pursuant to **Connecticut General Statutes Sections 46a-82, 46a-83 and 46a-84** has a statutory mandate to receive, investigate, prosecute and adjudicate complaints of discrimination in employment, housing, credit and public accommodations. The Connecticut General Statutes impose statutory timeframes in which various investigative tasks must be performed. The CHRO processes approximately **4000 complaints a year**. In order to meet the statutory mandate of investigating complaints in accordance with the Connecticut General Statutes, the CHRO must have sufficient HRO Representatives to perform investigative tasks. Investigative tasks include assisting an individual who has complained of discrimination with filing a complaint affidavit, serving the complaint, reviewing the complaint, answer, rebuttal and interrogatory responses and making an initial determination, engaging in mediation, conciliations and negotiations with the parties, noticing parties regarding investigation, conducting fact finding conferences, interviewing witnesses, reviewing current case law regarding the reasonable cause standard and writing up comprehensive findings of fact and making final investigative determinations and preparing reports. These tasks are time consuming, comprehensive and critical to the CHRO meeting its statutory mandates and timeframes. Since June of 2008, the CHRO has not been allowed to refill any position, and specifically has not been allowed to refill critical investigator positions once an investigator has retired or resigned from the agency.

The CHRO is the state equivalent to the Federal Civil Rights Agency, the Equal Employment Opportunities Commission (EEOC). The CHRO has a work-sharing agreement with the EEOC which requires that the CHRO remain substantially equivalent with the EEOC. The CHRO receives federal funding from the EEOC for eligible cases that are filed and processed to closure. Currently, the rate of federal funding is the following: **\$50** to intake a case and **\$500** for closure of a case. On average an investigator closes **45 cases** a year. The Commission **lost \$163,000** in federal funding this past year because three of the Regional Offices in the Agency do not have the requisite number of investigators to keep pace with the number of complaints being filed. The state stands to lose more federal funding in the upcoming year if the HRO Representative positions are not filled. Due to the federal funding for case intake and closure **33%** of an HRO Representative's salary and benefits is actually covered by Federal Funding. The federal money received from the EEOC is deposited into the General Fund. Thus, the cost that the state must bare in order to meet its statutory mandates is only 66% of the actual cost. Due to the shrinking resources of the Agency and the critical need for the additional HRO Representatives to investigate complaints of discrimination the services that the CHRO can provide to the general public are being diminished. Case processing times have been protracted, Complainants are dissatisfied with the state, due to processing times, and victims of illegal discrimination feel left with no recourse. Moreover, the cost to the business or landlord or individual accused of



discrimination increases the longer it takes to investigate a complaint which again diminishes the services being offered to the public.

## JUSTIFICATION

### HRO Representative (Norwich Regional Office)

The CHRO is requesting to **re-fill three (3)** HRO Representative positions in its Norwich Regional Office. In order for there to be efficient, effective and responsible operation of each regional office, there must be, at a minimum **eight (8)** investigators in each regional office. At this time, this Regional Office only has five investigators. The CHRO, pursuant to **Connecticut General Statutes Sections 46a-82, 46a-83 and 46a-84** has a statutory mandate to receive, investigate, prosecute and adjudicate complaints of discrimination in employment, housing, credit and public accommodations. The Connecticut General Statutes impose statutory timeframes in which various investigative tasks must be performed. The CHRO processes approximately **4000 complaints a year**. In order to meet the statutory mandate of investigating complaints in accordance with the Connecticut General Statutes, the CHRO must have sufficient HRO Representatives to perform investigative tasks. Investigative tasks include assisting an individual who has complained of discrimination with filing a complaint affidavit, serving the complaint, reviewing the complaint, answer, rebuttal and interrogatory responses and making an initial determination, engaging in mediation, conciliations and negotiations with the parties, noticing parties regarding investigation, conducting fact finding conferences, interviewing witnesses, reviewing current case law regarding the reasonable cause standard and writing up comprehensive findings of fact and making final investigative determinations and preparing reports. These tasks are time consuming, comprehensive and critical to the CHRO meeting its statutory mandates and timeframes. Since June of 2008, the CHRO has not been allowed to refill any position, and specifically has not been allowed to refill critical investigator positions once an investigator has retired or resigned from the agency.

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discrimination increases the longer it takes to investigate a complaint which again diminishes the services being offered to the public.

## JUSTIFICATION

### HRO Representative (Bridgeport Regional Office)

The CHRO is requesting to **re-fill three (3)** HRO Representative positions in its Bridgeport Regional Office. In order for there to be efficient, effective and responsible operation of each regional office, there must be, at a minimum **eight (8)** investigators in each regional office. At this time, this office only has five investigators. The CHRO, pursuant to **Connecticut General Statutes Sections 46a-82, 46a-83 and 46a-84** has a statutory mandate to receive, investigate, prosecute and adjudicate complaints of discrimination in employment, housing, credit and public accommodations. The Connecticut General Statutes impose statutory timeframes in which various investigative tasks must be performed. The CHRO processes approximately **4000 complaints a year**. In order to meet the statutory mandate of investigating complaints in accordance with the Connecticut General Statutes, the CHRO must have sufficient HRO Representatives to perform investigative tasks. Investigative tasks include assisting an individual who has complained of discrimination with filing a complaint affidavit, serving the complaint, reviewing the complaint, answer, rebuttal and interrogatory responses and making an initial determination, engaging in mediation, conciliations and negotiations with the parties, noticing parties regarding investigation, conducting fact finding conferences, interviewing witnesses, reviewing current case law regarding the reasonable cause standard and writing up comprehensive findings of fact and making final investigative determinations and preparing reports. These tasks are time consuming, comprehensive and critical to the CHRO meeting its statutory mandates and timeframes. Since June of 2008, the CHRO has not been allowed to refill any position, and specifically has not been allowed to refill critical investigator positions once an investigator has retired or resigned from the agency.

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## JUSTIFICATION

### IT Analyst 3

The CHRO is requesting to **Re-fill** of an IT Analyst 3 position, as Joseph McQuiggan, who held this position for decades recently retired. A refill of this position is critical to the technological and efficient operation of the CHRO. An analyst is necessary to maintain the CHRO's databases such as S:/database/centraloffice/chrodata.mdb; s:/database/capitol/chrodata.mdb; s:/database/southwest/chrodata.mdb; s:/database/westcentral/chrodata.mdb; s:/database/eastern/chrodata.mdb; g:/gp-ph/phdb/phdata.mdb; g:/gp-cal/chrocalendar/chrocalendar.mdb; chroapp.mdb; MIS database for commission reports and statistics, to transfer cases that are flagged from one database to another and electronically transfer daily records and remove them from the originating database expeditiously; to prepare weekly reports for each of the Regional Offices including 190 day reports, 90 day reports, 100 day reports for Housing and 1 year reports in order to ensure that the Regions are complying with statutory timeframes set forth in **Connecticut General Statutes Section 46a-83**; to perform strategic report generation, maintain complaint processing reporting and tracking, which is critical to the management of the CHRO's complaint inventory, control system conduit for CHRO-EEOC and CHRO-HUD, monitor, control and repair computer equipment in Central Office and the four Regional Offices, perform program maintenance and report generation functions and act as a conduit with DOIT; to maintain the Agency's website and assist with the Agency's goal of going paperless; to maintain and prepare a list of 21 month letters to be distributed to complainants in accordance with statutory mandates; to prepare Commission meeting reports on the Agency's progress with meeting statutory timeframes and submit the reports to the Executive Director, DAS and OPM; and to create and maintain the CHRO's complaint tracking system which is a database of complaints filed and processed by the agency. Further, the Analyst combines the distributed data into one database called the All State Database.

The position is critical because the reports prepared by the Analyst such as the EEOC closure report must be transferred electronically in order to validate the closure information received from the four Regional Offices and ensure that the General Fund will receive a deposit of **Federal dollars** for the intake and processing of complaints. Without the reports and the electronic transfer of the reports the CHRO will be in danger of losing federal funding which is deposited into the General Fund. Further, the Analyst must prepare closure reports and maintain and track reconsideration numbers such that the request for funds from the EEOC is accurate and may be substantiated. The cost to employ each HRO Representative (salary and benefits) performing investigative functions is offset by federal funding at a rate of **33% per investigator per year**. The Analyst must also maintain a database for HUD which also offsets the cost of an HRO Representative performing investigative functions in Housing at a rate of 33% per investigator per year. The failure to refill this position will result in a loss of federal funding.

## JUSTIFICATION

### Two Human Rights Attorney I Positions (Central Office – Legal Division)

The CHRO is requesting to fill two Human Rights Attorney I positions in the Legal Division in its Central Office. In order for there to be efficient, effective and responsible operation of the legal division, there must be, at a minimum ten Human Rights ten (10) Human Rights Attorneys in the legal division. The CHRO, pursuant to **Connecticut General Statutes Sections 46a-82, 46a-83 and 46a-84 et seq.** has a statutory mandate to receive, investigate, prosecute and adjudicate complaints of discrimination in employment, housing, credit and public accommodations. The Connecticut General Statutes impose statutory timeframes in which various investigative tasks must be performed and impose legal processes that must be performed. CHRO processes approximately **4000 complaints a year**. In order to meet the statutory mandate of processing complaints in accordance with the Connecticut General Statutes, the CHRO must have sufficient Human Rights Attorneys to prosecute discrimination complaints and perform related litigation responsibilities, to perform other legal functions of the agency, to provide training and outreach to the public and to the CHRO staff, and to perform the additional legal-related requirements required by Public Act 11-237.

Additional legal functions were created pursuant to the requirements of Public Act 11-237, the CHRO legal division must review every Merit Assessment Review Case dismissal decision to assure the correctness of the decision. It must also conduct Early Legal Interventions when they are requested. The ELIs require legal reviews of the status of the case and will result in various decisions. They can result in returning cases to investigation for directed action, they may also result in redirecting the case to public hearing bypassing the investigation processing. ELI direction to Public Hearing is increasing litigation cases assigned to attorneys. Additionally, mediations must be performed on thousands of cases now pending at investigation. Attorneys are involved in performance of the new early mediation of cases retained at MAR.

At this time, the Legal Division has one Principal Attorney who serves in the capacity of the Commission Counsel for general matters and coordinates and oversees the work of the seven Human Rights Attorneys, in addition to litigating appeals of investigation dismissals and working on amicus cases, and working on legislative and other legal work. He also coordinates and oversees the law student intern/extern and college intern programs (both of which provide assistance to the legal division) and pro bono profession and legal volunteers. The Legal Division also has 7 Human Rights attorney IIIs.

All seven (7) Human Rights Attorneys are actively engaged in litigation of employment housing and public accommodations cases at Public Hearing, housing discrimination case prosecutions at court, and appellate work on public hearing cases and other cases at court and the attorneys provide assistance to the principal attorney in various functions. Human Rights Attorneys are also actively involved in providing training to representatives of other state agencies, lawyers and entity representatives in the public who are subject to the law, providing training about the

law and the CHRO to student organizations and to others at colleges schools organizations and to other segments of the public as requested, and provide training for CHRO investigators. Attorneys are conducting legal reviews of cases, conducting ELI reviews, and mediating cases (pursuant to the requirements of Public Act 11-237) and spending two or more days a month conducting mediations and providing assistance in the regional offices to the investigation staff.

Because the terms of the CHRO's adjudicators have been vacant for 6 months, the legal division has been able to perform all of its functions and the additional legal related functions required by Public Act 11-237 as well as taking about 400 cases for mediations (mediations require time to be successful). The OPH adjudicators are now appointed and have resumed CHRO public hearing adjudications. The legal division will be unable to continue to perform all of the required functions without two (2) additional Human Rights Attorney Is.

The CHRO is the state equivalent to the Federal Civil Rights Agency, the Equal Employment Opportunities Commission (EEOC). The CHRO has a work-sharing agreement with the EEOC which requires that the CHRO remain substantially equivalent with the EEOC. The CHRO receives federal funding from the EEOC for eligible cases that are filed and processed to closure. Currently, the rate of federal funding is the following: \$50 to intake a case and \$500 for closure of a case. On average each investigator closes 45 cases a year. The inability of the CHRO to replace investigators who have resigned or retired over the last five years has increased case loads and substantially slowed down case processing so that the case closures have significantly diminished in number. The Commission lost \$163,000 in federal funding this past year because three of the Regional Offices in the Agency do not have the requisite number of investigators to keep pace with the number of complaints being filed. Public Act 11-237 requires Human Rights Attorneys to become more involved in certain functions of the investigations to ensure that processing is performed correctly and expeditiously. Of the 400 mediation cases the attorneys have taken since the passage of Public Act 11-237, 85 cases were closed and others are pending closure. The ELIs are expediting case processing at investigation. For example, at this time about 40 cases have gone through the ELI process and 15 ELI cases were recently directed to bypass investigation and be processed at Public Hearing. ELI case reviews will enable cases in certain circumstances, to be directed to public hearing for expedited processing. The state stands to lose more federal funding in the upcoming year if the Human Rights Attorney positions are not filled. Due to the federal funding for case intake and closure 33% of investigation processing is actually covered by Federal Funding. The federal money received from the EEOC is deposited into the General Fund. Thus, the cost that the state must bear in order to meet its statutory mandates is only 66% of the actual cost. Due to the shrinking resources of the Agency and the critical need for the additional HRO Representatives and Human Rights Attorneys to perform investigation processing complaints of discrimination the services that the CHRO can provide to the general public are being diminished. Complainants are dissatisfied with the state, due to processing times, and victims of illegal discrimination feel left with no recourse. Moreover, the cost to the business or landlord or individual accused of discrimination increases the longer it takes to investigate a complaint which again diminishes the services being offered to the public.

**Legal secretary or assistant**

**HUD gave us demerits for low staffing in Housing. Need**

**Housing secretary**

**Housing investigator**

## **JUSTIFICATION**

### **HRO Representative (Norwich Regional Office)**

The CHRO is requesting to fill **two (2)** HRO Representative positions in its Norwich Regional Office. In order for there to be efficient, effective and responsible operation of each regional office, there must be, at a minimum **eight (8)** investigators in each regional office. At this time, this Regional Office only has five investigators. The CHRO, pursuant to **Connecticut General Statutes Sections 46a-82, 46a-83 and 46a-84** has a statutory mandate to receive, investigate, prosecute and adjudicate complaints of discrimination in employment, housing, credit and public accommodations. The Connecticut General Statutes impose statutory timeframes in which various investigative tasks must be performed. The CHRO processes approximately **4000 complaints a year**. In order to meet the statutory mandate of investigating complaints in accordance with the Connecticut General Statutes, the CHRO must have sufficient HRO Representatives to perform investigative tasks. Investigative tasks include assisting an individual who has complained of discrimination with filing a complaint affidavit, serving the complaint, reviewing the complaint, answer, rebuttal and interrogatory responses and making an initial determination, engaging in mediation, conciliations and negotiations with the parties, noticing parties regarding investigation, conducting fact finding conferences, interviewing witnesses, reviewing current case law regarding the reasonable cause standard and writing up comprehensive findings of fact and making final investigative determinations and preparing reports. These tasks are time consuming, comprehensive and critical to the CHRO meeting its statutory mandates and timeframes. Since June of 2008, the CHRO has not been allowed to refill any position, and specifically has not been allowed to refill critical investigator positions once an investigator has retired or resigned from the agency.

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of a case. On average an investigator closes **45 cases** a year. The Commission lost **\$163,000** in federal funding this past year because three of the Regional Offices in the Agency do not have the requisite number of investigators to keep pace with the number of complaints being filed. The state stands to lose more federal funding in the upcoming year if the HRO Representative positions are not filled. Due to the federal funding for case intake and closure **33%** of an HRO Representative's salary and benefits is actually covered by Federal Funding. The federal money received from the EEOC is deposited into the General Fund. Thus, the cost that the state must bare in order to meet its statutory mandates is only **66%** of the actual cost. Due to the shrinking resources of the Agency and the critical need for the additional HRO Representatives to investigate complaints of discrimination the services that the CHRO can provide to the general public are being diminished. Case processing times have been protracted, Complainants are dissatisfied with the state, due to processing times, and victims of illegal discrimination feel left with no recourse. Moreover, the cost to the business or landlord or individual accused of discrimination increases the longer it takes to investigate a complaint which again diminishes the services being offered to the public.

## JUSTIFICATION

### HRO Representative (Bridgeport Regional Office)

The CHRO is requesting to re-fill **three (3)** HRO Representative positions in its Bridgeport Regional Office. In order for there to be efficient, effective and responsible operation of each regional office, there must be, at a minimum **eight (8)** investigators in each regional office. At this time, this office only has five investigators. The CHRO, pursuant to **Connecticut General Statutes Sections 46a-82, 46a-83 and 46a-84** has a statutory mandate to receive, investigate, prosecute and adjudicate complaints of discrimination in employment, housing, credit and public accommodations. The Connecticut General Statutes impose statutory timeframes in which various investigative tasks must be performed. The CHRO processes approximately **4000 complaints a year**. In order to meet the statutory mandate of investigating complaints in accordance with the Connecticut General Statutes, the CHRO must have sufficient HRO Representatives to perform investigative tasks. Investigative tasks include assisting an individual who has complained of discrimination with filing a complaint affidavit, serving the complaint, reviewing the complaint, answer, rebuttal and interrogatory responses and making an initial determination, engaging in mediation, conciliations and negotiations with the parties, noticing parties regarding investigation, conducting fact finding conferences, interviewing witnesses, reviewing current case law regarding the reasonable cause standard and writing up comprehensive findings of fact and making final investigative determinations and preparing reports. These tasks are time consuming, comprehensive and critical to the CHRO meeting its statutory mandates and timeframes. Since June of 2008, the CHRO has not been allowed to refill any position, and specifically has not been allowed to refill critical investigator positions once an investigator has retired or resigned from the agency.

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resources of the Agency and the critical need for the additional HRO Representatives to investigate complaints of discrimination the services that the CHRO can provide to the general public are being diminished. Case processing times have been protracted, Complainants are dissatisfied with the state, due to processing times, and victims of illegal discrimination feel left with no recourse. Moreover, the cost to the business or landlord or individual accused of discrimination increases the longer it takes to investigate a complaint which again diminishes the services being offered to the public.

Legal secretary or assistant

HUD gave us demerits for low staffing in Housing. need

Housing secretary

Housing investigator

**Justification for Additional CHRO CCU Staff**  
**Upon Requirement for Municipalities to Comply**  
**With Contract Compliance**

The Commission on Human Rights and Opportunities Contract Compliance Unit (CHRO) is requesting to hire 10 (ten) Human Rights and Opportunities Representatives (HRO Rep.) within its Central Office located in Hartford upon the passing of Senate Bill No. 544/Municipal Exemption. 5 (five) of these positions would perform as project site investigators, and the other 5 (five) would perform as contract compliance reviewers.

Pursuant to Connecticut General Statutes Section (C.G.S. Sec.) 46a-54(2) is mandated to organize CHRO into a contract compliance unit for the efficient conduct of business of CHRO. Such business being mandated by CHRO's duties. Particularly, the duties outlined in C.G.S. Secs. 46a-56(5) and 46a-56(6), which states CHRO shall monitor state contracts to determine whether they comply with C.G.S. Secs. 4a-60 and 4a-60a, and those provisions of the general statutes which prohibit discrimination; and compile data concerning state contracts with female and minority business enterprises, and submit a report annually to the General Assembly concerning the employment of such business enterprises as contractors and subcontractors. Currently, there is not oversight on municipal projects funded by the state. This lack of oversight is cause for concern that in the case of local or regional boards of education, local officials may more easily be given to or influenced by political patronage, mismanagement and/or other vices when awarding municipal construction contracts to bidders. Which is the rationale, behind the State's passage of C.G.S. Secs. 4a-60 and 4a-60a and the creation CHRO CCU to enforce the statute. That is to prevent unfair or discriminatory practices when awarding state contracting dollars.

The addition of 10 (ten) CCU personnel would municipal exemption will allow CHRO to conduct its duties and ensure the Governor's agenda of reducing the State's deficit by creating jobs and employing Connecticut based small businesses is advanced. Specifically, it would allow equal opportunity to **ALL** of Connecticut businesses to bid and perform on **ALL** projects funded by the state, which includes those projects administered by DEEP, CSL, DPH, DECD, OPM, and SBE.

Just because this funding is eventually handed over to Boards of Education, and/or municipalities, gives no reason to assume that the money will be wisely spent and in a manner that provides equal opportunity for the state's small business and small businesses and owned by ethnic minorities, women, and persons with disabilities to competitively bid and actually perform on projects funded by the state (e.g. tax dollars).

This exemption provides an unfair advantage to suburban and white businesses at the expense of urban small businesses and urban small businesses owned by ethnic minorities, women, and persons with disabilities.

Additional personnel will ensure that in all 169 towns:

1. Connecticut's small businesses are working on town construction projects;
2. Connecticut's taxpayers have access to employment opportunities created by their tax dollars;
3. Town's economy grows through the patronage of its small businesses;
4. Connecticut's working families can maintain their livelihood during these rough economic times;
5. Will ultimately rejuvenate the economy of Connecticut's towns by employing its resident's and small businesses within the town;
6. Will encourage to use of talent coming out of the local technical schools where school construction is being performed and partnerships can be formed.

Currently, the C.G.S. Secs. 46a-68 et. seq., imposes statutory timeframes in which various contract compliance tasks must be performed. The CHRO CCU currently has only 3 (three) full-time HRO Reps who monitor **125 (one hundred and twenty-five) open state funded project files each**. Such tasks include, but are not limited to:

- a. The review of a state funded project, efforts to employ Connecticut based small businesses and small businesses owned by ethnic minorities, for compliance with state statutes and regulations;
- b. Conducting field reviews;
- c. Assisting business owners and/or individual employees that have complained of inequitable treatment within the state contracting procedures;
- d. Ensure state contracts make a good faith effort to meet workforce goals;
- e. Engaging in mediation , conciliations, and negotiations with contracting parties;
- f. Interviewing business owners, employees, and witnesses;
- g. Making initial determinations;
- h. Monitor the equitable treatment and payment of each Connecticut based small business and small business owned by ethnic minorities, women, and persons with disabilities working on state funded projects;

- i. Close-out state funded project files "in compliance" or "not in compliance" with state statutes and regulations once the project file closed;
- j. Provide technical assistance (on-site and off-site) to contracting parties;
- k. Provide training (on-site and off-site) to legislative aides, commissioners, in-house counsel, etc, regarding the applicability the State's contract compliance laws; and
- l. Complete special projects as assigned.

These tasks are time consuming, comprehensive and critical to the CHRO CCU meeting its statutory mandates and timeframes. Since, June of 2008, the CHRO has not been allowed to refill any CCU HRO Rep. positions once a CCU HRO Rep. has retired or been resigned The CHRO CCU is the state equivalent of the Office of Federal Contract Compliance and the Federal Highway Administration. The CCU has a working relationship with these two federal agencies, especially when state funds are comingled with federal funds.

Given the economic despair Connecticut is currently experiencing, Governor Dannel Malloy has focused his efforts on reviving Connecticut's economy by encouraging the utilizing of Connecticut based small businesses. Such efforts Gov. Malloy has sponsored are the Economic Summit, which addressed the need for larger businesses to assist in the utilization and growth of smaller businesses. Another effort Gov. Malloy has sponsored, in an effort to grow and maintain Connecticut businesses, is referred to as the Governor's First Five. The Governor's First Five provides state funds to five multi-million dollar construction projects, in an agreement for companies to stay or move to Connecticut in return for a promise from the company to expand its labor force via the hiring of Connecticut residents. The CHRO CCU is the only state agency that will provide oversight on these multi-million dollar construction projects, thus ensuring that Connecticut's small businesses are being utilized. Utilized for labor, materials, service providers, and trade work. There is not other state agency, other than the CHRO CCU, which enforces the C.G.S. requiring companies that contract with the state actually use, treat equitably, and pay promptly Connecticut based small businesses. As a result of the CCU's statutory and regulatory mandates, the CCU's work volume will increase exponentially with the mobilization of Gov. Malloy's First Five multi-million dollar construction projects.

Due to the shrinking resources of the Agency and the critical need for the additional CCU HRO Reps to perform contract compliance duties, the services the CCU can provide to Connecticut based small businesses and small businesses owned by ethnic minorities, women, and persons with disabilities are being diminished. Project file review and monitoring times have been, and with the reporting of Gov. Malloy's First Five, will continue to be protracted. Moreover, the overall economic despair the State is experience will not improve, if its small

businesses are not working. Basically, the State and its economy cannot afford not to grant the CHRO CCU addition personnel.