



**State of Connecticut**  
**COMMISSION ON HUMAN RIGHTS AND**  
**OPPORTUNITIES**

450 Columbus Boulevard, Suite 2, Hartford, CT 06103

*Promoting Equality and Justice for all People*

**Testimony of Executive Director Tanya A. Hughes**  
**Commission on Human Rights and Opportunities**

**Appropriations Committee**  
**February 17, 2023**

**Agency Overview**

The Commission on Human Rights and Opportunities (“CHRO”) has a central office located in Hartford, as well as four regional offices around the state: Capitol Region (Hartford), Eastern Region (Norwich), West Central (Waterbury), and Southwest Region (Bridgeport). These regional offices take employment, credit transaction or public accommodation discrimination complaints that occur in towns located within a region.

The central office is comprised of the following units: Executive, Legal, Housing Discrimination, Contract Compliance, and Affirmative Action. The Housing Discrimination Unit takes housing discrimination complaints regardless of where they occur in the state. In addition to helping process and investigate complaint, the central office also reviews contract compliance and affirmative action plans. All the CHRO offices and units have extensive training, outreach, and education responsibilities, some of which are statutorily required. Over the last few years, domestic violence prevention training for state employees and sexual harassment prevention training for most employees across the state have been developed by the CHRO and made publicly available on our website.<sup>1</sup>

The CHRO Office of Public Hearing (OPH) is also located in Hartford. OPH is included within the CHRO’s overall budget but is not under the administrative control of the CHRO Executive Director. Cases at OPH are heard by a Chief Human Rights Referee or two Human Rights Referees, for a total of three referees, all of whom are Governor appointees. There are currently only two referees.

The CHRO is governed by a nine-person commission appointed with the advice and consent of both houses of the General Assembly. The Governor holds five appointments; the president pro tempore of the Senate, the minority leader of the Senate, the speaker of the House of Representatives, and the minority leader of the House of Representatives each have one. The

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<sup>1</sup> The domestic violence prevention training has been available since January 1, 2023. Since the sexual harassment prevention training’s inception in October of 2019, approximately 650,000 completion certificates have been issued through our system. (This figure does not account for in-person training or training tracked through the State of Connecticut’s LinkedIn Learning system.)

Governor shall select a chairperson from among the members.<sup>2</sup> The commission currently has three vacancies: two seats that are Governor appointments and one that is a Senate pro tempore appointment. The commission is also without a chairperson.

The CHRO executive director is appointed by the commission for four-year terms.<sup>3</sup> The CHRO is not an executive branch agency and is within the Labor Department for administrative purposes only.

### Disparity Study

With the adoption of Special Act 21-8 and the 2021 budget, the CHRO, in consultation with DAS and OPM, received funding to engage with a firm to conduct a long-needed disparity study. \$4 million was appropriated for the conducting of the Disparity Study and the Equity Study discussed below. The Disparity Study will examine whether Connecticut's set-aside program, established under Connecticut General Statutes 4a-60g, achieves its goal of facilitating the participation of small contractors and minority business enterprises in state contracting and procurement.

A contract was signed on April 5 with Griffin & Strong, PC ("GSPC"). In October, GSPC and CHRO held a series of informational public meetings to inform interested stakeholders about the study with cumulative attendance of over 200 people.

In the months since the study was formally begun, GSPC has been drafting the legal chapter of the study, drafting the policy review chapter based on approximately a dozen policy interviews with state personnel, and putting together a data assessment report that will guide its work going forward. GSPC is currently in the initial stages of making its first data requests to various state parties as part of compiling the data it will need to conduct the disparity analyses.

The final disparity study report is on schedule to be completed in March 2024.

#### *GSPC Project Timeline:*

Task Name	Status	Start	Finish
Project Duration		04/11/22	03/29/24
Internal Project Initiation	Complete	04/11/22	05/20/22
Kick off and Data Assessment	Complete	04/26/22	02/07/23
Informational Meetings	Complete	08/08/22	10/21/22
Plan for Data Collection	In Progress	11/16/22	03/07/23
Collect Quantitative Data	In Progress	2/13/23	06/13/23
Conduct Case Law Review	Complete	04/25/22	12/16/22

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<sup>2</sup> CGS Sec. 46a-52(a)

<sup>3</sup> CGS Sec. 46a-52(c)

Policy Review	In Progress	06/13/22	03/03/23
Conduct Anecdotal Interviews		03/20/23	11/10/23
Online Survey of Business Owners		04/17/23	06/02/23
Telephone Survey of Business Owners		08/14/23	01/12/24
Collect and Analyze Anecdotal Evidence		11/28/22	01/05/24
Prepare Databases		07/17/23	09/15/23
Conduct Relevant Market Analysis		09/18/23	10/20/23
Conduct Utilization Analysis		10/23/23	12/01/23
Conduct Availability Analysis		12/04/23	12/29/23
Conduct Disparity Analysis		01/02/24	01/19/24
Conduct Statistical Significance Tests		01/02/24	02/16/24
Private Sector Analysis		01/15/24	02/09/24
Complete Findings and Recommendations		02/12/24	02/19/24
Draft Report		02/20/24	03/01/24
State Staff Review and Revise to Final Report		03/04/24	03/22/24
Presentations		03/25/24	04/03/24

## Equity Study

The 2021 budget included funding for the conducting of a study in equity in state government programs and actions (Section 81 of Public Act 21-2 of the June Special Session). \$4 million was appropriated for the conducting of this Equity Study and the Disparity Study that is already underway as required by Special Act 21-8. Section 81 of PA 21-2 required the CHRO, the Department of Administrative Services (“DAS”), and the Office of Policy and Management (“OPM”) to solicit proposals for the conducting of an Equity Study and ultimately choose a proposer to conduct the study. On December 1, 2022 Connecticut’s contract with Faulkner Consulting Group (“FCG”), the chosen proposer, went into effect and the Equity Study formally began.

This study requires FCG, in consultation with DAS, OPM, and the CHRO as the client agency under the contract, to use a variety of methods to assess equity within each state executive branch agency and their policies and programs. Over the next nine months, FCG will be consulting with members of communities that have been historically underrepresented or subject to discrimination in state policies and programs, as well as consulting with state agencies. As part of the initial stage of the Equity Study, FCG will be conducting interviews with each executive branch agency to discuss key challenges and opportunities to improve equity,

existing equity initiatives in the agency, organizational culture and equity, relationships with stakeholders, and the adequacy of data collection/analysis/reporting.

As getting input and feedback from members of the public, especially members of underserved communities and users of state programs and services, FCG will be holding a series of public meetings in upcoming weeks to publicly introduce the Equity Study and preview opportunities for community engagement. They will be held over Zoom at the following dates and times, with links also available on the CHRO's website:

[Tuesday, February 21, 12:00 pm – 1:00 pm](#)

[Friday, February 24, 11:00 am – 12:00 pm](#)

[Monday, March 6, 5:00 pm – 6:00 pm](#)

The final report is on schedule to be delivered in October 2023.<sup>4</sup>

## **Budget Requests**

### *Durational positions:*

The CHRO currently has nine durational positions that were approved due to an influx of cases related to the COVID-19 pandemic. The Housing Discrimination Unit in Hartford and all four regional offices have seen a significant increase in the number of inquiries and complaint filing related to the pandemic. Many of these cases involve an employer's alleged failure to accommodate employees with disabilities and medical conditions who are vulnerable. Now that COVID case numbers have dropped and many people have returned to workplaces and places of public accommodation, there are even more cases regarding accommodations for those with medical vulnerabilities, as well as those with long COVID and other issues resulting from the pandemic itself. The CHRO has also seen COVID-19 related cases of disparate impact, such as requiring Black school children to quarantine in situations where White children are not required to quarantine.

The CHRO requested that the Office of Policy and Management and the Governor extend these nine durational positions to reflect the elevated case count that shows no sign of abating even though the worst of the COVID pandemic seems to be behind us. Though the pandemic continues to slow and will hopefully even enter an endemic phase, society has been left permanently changed. Workplaces, housing, and the way we experience public accommodations have all been altered and the CHRO anticipates that the number of discrimination complaints filed as a result will continue to be higher as well. As such, the CHRO respectfully requests that the Appropriations Committee grant our request to extend these nine durational positions even though this request was not granted in the Governor's proposed budget.

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<sup>4</sup> Included with this presentation is FCG's contractually required Progress Report dated January 30, 2023.

*Clean Slate positions:*

With the passage of Public Act 21-32, commonly known as the “Clean Slate Act,” the CHRO expected to need two additional Human Rights Attorney I and two Human Rights and Opportunities Trainee positions to process, investigate and litigate the filed complaints under the new legislation’s provisions starting January 1, 2023. This anticipated need was reflected in the fiscal note for PA 21-32.

However, under the Governor’s proposed budget, the CHRO’s appropriated position count remains at 84. The CHRO respectfully requests that it be increased to 88 to reflect the anticipated implementation of the Clean Slate Act later this year.

The CHRO is deeply committed to the goals of the Clean Slate Act. It is critically important that individuals with erased criminal history records face fewer barriers in renting or buying a home, accessing credit, or getting a job. But while their records might be erased, it will still be possible to find out about an individual’s erased criminal record history through an internet search, old newspaper articles, or even just word of mouth. If a person with an erased criminal history record feels they have been discriminated against on that basis and files a complaint at the CHRO, we want to be sure that we have the staff to investigate that complaint in a fair and timely manner.

*CHRO Civil Rights Museum Project:*

The CHRO is in the planning stages of The Connecticut CHRO Civil Rights Museum project. The Connecticut CHRO Civil Rights Museum, which would be located in downtown Hartford, would aim to tell the story of Connecticut’s role in the Civil Rights Movement and the state's pioneering social justice and anti-discrimination laws.

The CHRO is the oldest governmental civil rights agency in the nation. Through this museum project, the CHRO will work with State and Federal partners and Connecticut businesses to educate stakeholders and residents about civil and human rights law enforcement.

Further, the museum would take a deep look at opportunities in Connecticut: what groups have been given opportunities in the state and what groups have been denied opportunities. These opportunities can come in the form of job choices, economic growth for communities, accessibility to affordable housing, equitable education, and more.

The CHRO will endeavor to highlight the history of programs such as Kid Governor, Connecticut Kids Court Academy, Connecticut Kids Court, the Connecticut Bar Foundation, and Connecticut Bar Association’s social justice programs.

This project will profoundly impact economic and community development, community renewal, social justice, equity and equality, access to opportunity and positive community effect.

A key part of the Commission on Human Rights and Opportunities' statutory mission is to provide education and training to the public regarding Connecticut's civil rights laws and to reduce discrimination and prejudice through education. We believe that this project would be a crucial step towards fulfilling the CHRO's mission.

The CHRO estimates that the initial costs of establishing the museum would be approximately \$3.2 million. This cost includes building out the space that the CHRO has identified as a potential location. Once the museum is established, the estimated cost to keep the museum running would be approximately \$250,000 per year. The CHRO's hope is to cover these costs through a combination of state funding and private fundraising, and respectfully requests that the committee consider appropriating funding for this project. While this project was not on the budget request form that the Department of Labor submitted to OPM on CHRO's behalf, CHRO has made OPM and the Governor's Office aware of the critical need for the project to be funded at this time.

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The CHRO appreciates the Appropriations Committee's time and consideration and is happy to answer any questions.