



# State of Connecticut COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Contract Compliance Unit – 450 Columbus Blvd., Suite 2, Hartford, CT 06103

*Promoting Equality and Justice for all People*

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## **Notice of Policy Change Regarding Failure to Submit CHRO Forms and Closure Documents**

Effective June 1, 2017, if a company fails to submit the required reporting forms (e.g., Forms cc-257, cc-257a, cc-257b, cc-258a, and cc-259) after the Commission on Human Rights and Opportunities (“CHRO”) has sent a second request, the company’s project file will be referred to the CHRO’s Legal Division to consider initiating a CHRO complaint of discrimination and/or noncompliance against the contractor or subcontractor.

Effective June 1, 2017, if a company fails to submit the required file closure documents (e.g., cover letter, Final cc-258a, Final Attachment III, lien waivers, certificate of substantial completion) after the CHRO has sent a second request, the company’s project file will be referred to the CHRO’s Legal Division to consider initiating a CHRO complaint of discrimination and/or noncompliance against the contractor or subcontractor.

For your information, when a noncompliance complaint or discrimination complaint against a contractor is initiated by the CHRO through its attorneys, the complaint is sent directly to the CHRO’s Office of Public Hearings (an administrative law tribunal) to commence a public hearing proceeding. Through this proceeding, a human rights referee (an administrative law judge) will be assigned to the case. The case will then proceed through the public hearing process, which includes, but is not limited to, discovery of documents, motion practice, witness interviews, and a public hearing/trial (an administrative law trial).

After the trial is conducted and evidence is presented, the presiding human rights referee will determine whether there is noncompliance and/or unlawful discrimination. If the human rights referee decides that a contractor has engaged in unlawful discrimination and/or noncompliance, then the human rights referee is authorized to issue orders for various forms of penalties, fines, and other ordered actions. These include, but not limited to, the State’s retaining two percent of the total value of the contract, debarment of the contractor from participating in State-funded contracting for two years, and other actions. *See* Conn. Gen. Stat. § 46a-56(c) and (d) and § 46a-86 as applicable.

If you have other State-funded contracts in progress or anticipate bidding on another State-funded contract, we urge you (as well as the individual responsible for the preparation of your company’s Plan and/or closeout documentation) to attend to [a CHRO Technical Assistance \(TA\) Session](#). Please let us know if you have questions so we can address them. TA sessions are held online, via the Microsoft Teams platform. You and your representative are urged to attend a TA session prior to your next Plan submission. To attend a contract compliance training, please use the above link to register.