п О П М	NAME & TITLE	DANA P. MOORE, Chief Equity Officer and Director	CITY of	
	AGENCY NAME & ADDRESS	Office of Equity & Civil Rights 7 E. Redwood Street, 9th Floor	BALTIMORE	WITMORE WOULD
	SUBJECT	City Council Bill 22-0256	IVIENIO	1797

TO

DATE: February 28, 2023

The Honorable President and Members of the Baltimore City Council Attn: Natawna B. Austin, Executive Secretary Room 409, City Hall 100 N. Holliday Street Baltimore, Maryland 21202

Re: City Council Bill 22-0256 – Public Safety Apprenticeship Program Commission

President and City Council Members:

The Office of Equity and Civil Rights has reviewed City Council Bill 22-0256. This bill establishes the Public Safety Apprenticeship Advisory Program. The bill proposes, among other provisions, that the Commission convene and oversee a subcommittee to which the City's Office of Equity and Civil Rights (OECR) serve as designated subcommittee members. The role of subcommittee is to investigate unlawful discrimination in employment and hiring practices.

The Community Relations Commission (CRC), housed within the OECR, is responsible for investigating and enforcing anti-discrimination laws under Article 4 of the Baltimore City Code. CRC is authorized to investigate and combat unlawful discrimination in five areas of Baltimore City life: employment, public accommodation, housing, education, and health and welfare services. Specifically, Article 4, § 3-1 provides authority to the CRC to investigate unlawful employment practices. CRC accepts, investigates, and resolves complaints of alleged unlawful discrimination. It also develops and monitors formally negotiated conciliatory agreements when a violation is found. Furthermore, the CRC has a contractual relationship with the federal Equal Employment Opportunity Commission (EEOC) to receive, investigate, and resolve federally deferred cases filed against Baltimore City private and government employers.

As mentioned above, the authority to exercise this power rests with the CRC in the OECR. It is unclear how the Public Safety subcommittee could appropriately perform this function. The CRC currently consists of 9 commissioners and 4 staff members, including a staff supervisor, to receive, authorize, investigate, and resolve multiple charges of discrimination.

Thus, OECR respectfully requests more information regarding the role and responsibilities of the subcommittee and to discuss the conflict with the CRC's power and authority. As it relates to implementing equity, equality, and fair practices in Baltimore City, OECR is committed and stands ready to serve wholeheartedly in this role.

Sincerely,

Dana P. Moore

Cc: Nina Themelis