

Agency Ethics Guide: Ethics Liaisons and Compliance Officers



Office of State Ethics
Peter Lewandowski, Executive Director



WELCOME

Dear Agency Ethics Liaisons and Compliance Officers:

Congratulations on being chosen as the Ethics Liaison and/or Compliance Officer for your agency and welcome to the Connecticut Office of State Ethics. This guide will provide you with an overview of the responsibilities your role encompasses.

The mission of the Connecticut Office of State Ethics is to practice and promote the highest ethical standards and accountability in state government by providing education and legal advice, ensuring disclosure, and impartially enforcing the Code of Ethics. The education component of the Office of State Ethics is often the most visible aspect of the agency's work with public officials and state employees.

I joined the Office of State Ethics in November 2011. I serve as advisor to the Executive Director and the Citizen's Ethics Advisory Board on public information, administrative policy, legislation and promotion of agency services. I manage the content of our agency website, and oversee development and publication of materials used state-wide for education and training purposes for all regulated parties and the general public.

Since arriving at the Office of State Ethics, my primary goal is to reinvigorate our educational programs, and to continue to develop and implement annual trainings and conferences. Our office conducts in-person trainings and typically reaches 1,000 – 3,000 people annually in this way. In-person trainings include sessions for constitutional offices, legislative, executive and judicial branch, quasi-public agencies, as well as the lobbying community and state contractors. We also reach thousands more through our interactive online training course and web-streaming video version of our training.

As the Ethics Liaison your role is to work with the Office of State Ethics, to coordinate and facilitate the development of ethics policies for your agency; to provide access to education and training; to update and maintain the Statement of Financial Interests filers list and to foster communication between the Office of State Ethics and your agency employees.

In closing, it is my hope that we will build a partnership and continue to promote ethics in the workplace. Please do not hesitate to contact me at (860) 263-2397 or at nancy.nicolescu@ct.gov. I am available to answer questions, and look forward not only to working with you, but to receiving your feedback and comments concerning our educational tools, website and monthly communications.

Sincerely,
Nancy S. Nicolescu
Director of Education & Communications

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OFFICE OF STATE ETHICS

Created on July 1, 2005, under Public Act [05-183](#), the Office of State Ethics (“OSE”) is an independent regulatory agency charged with administering and enforcing the Connecticut Codes of Ethics (“Ethics Codes”), which are found in Chapter 10 of the Connecticut General Statutes.

The OSE’s duties include educating all those covered by the Ethics Codes; interpreting and applying the Ethics Codes; investigating violations of, and otherwise enforcing, the Ethics Codes; and providing information to the public.

The OSE’s jurisdiction:

- | | |
|-----------------|---|
| Part I | Code of Ethics for Public Officials
General Statutes §§ 1-79 to 1-90a |
| Part II | Code of Ethics for Lobbyists
General Statutes §§ 1-91 to 1-101a |
| Part III | Lobbying: Miscellaneous Provisions
General Statutes §§ 1-101aa and 1-101bb |
| Part IV | Ethical Considerations Concerning Bidding and State Contracts
General Statutes §§ 1-101mm to 1-101rr |

The OSE Executive Director has overall responsibility for the welfare and effectiveness of the OSE, which has three divisions, the legal division, the enforcement division, and the administrative division.

The OSE’s governing body is the Citizen’s Ethics Advisory Board (“CEAB”), which has nine members appointed by the Governor and legislative leadership. The CEAB holds monthly meetings that are open to the public. A schedule of CEAB meeting dates, times, and locations is available at ct.gov/ethics.

CEAB Members:

- Attend monthly CEAB meetings
- Appoint and evaluate the Executive Director of the OSE
- Issue advisory opinions to persons subject to the Ethics Codes
- Serve as a Hearing Officer for non-confidential hearings held under the Uniform Administrative Procedures Act, General Statutes § [4-166](#) *et. seq.*
- Attend hearings to determine if violations occurred and, if so, assess penalties
- Attend special meetings if necessary
- Oversee legislative agenda

THE BIG PICTURE

All state officials and employees (except judges) are covered by Part I of the Code of Ethics for Public Officials. Lobbyists are covered by Part II of the Code of Ethics. It is important to remember that certain provisions of the Code also apply to public officials and state employees after they leave state service.

As you read through this guide, be aware that these laws were enacted to prevent individuals from using their public position or authority for personal, financial benefit.

ROLE OF ETHICS LIAISONS AND COMPLIANCE OFFICERS

Duties and Responsibilities

Ethics Compliance Officers must be appointed within each state agency and quasi-public agency that deals with or plans large state contracts. The responsibilities of a compliance officer include developing an agency ethics policy as well as training agency employees on the Code, and paying attention to any changes in the law as well as provisions specific to state contracting. Conn. Gen. Stat. [§1-101rr \(a\)](#).

Pursuant to Section [1-83 \(a\)\(2\)](#) of the Connecticut General Statutes, each state agency, department, board and commission shall develop and implement, in cooperation with the Office of State Ethics, an ethics statement as it relates to the mission of the agency, department, board or commission. The executive head of each such agency, department, board or commission shall be directly responsible for the development and enforcement of such ethics statement and shall file a copy of such ethics statement with the Department of Administrative Services and the Office of State Ethics.

Ethics Liaisons¹ must be appointed within each state agency and quasi-public agency that doesn't have an Ethics Compliance Officer. These officers serve as a link between the agency and the Office of State Ethics. Liaisons are responsible for developing agency ethics policies as well as coordinating employee training with the Office of State Ethics. Conn. Gen. Stat. [§1-101rr \(b\)](#).

The Office of State Ethics supports the responsibilities of the above officers by providing in-person and on-line training, educational videos and many other training materials upon request. The Office of State Ethics also sends a monthly electronic newsletter to each officer and liaison that highlights new developments in the law, summarizes new advisory opinions, includes handouts on complex areas of the law and provides answers to frequently-asked questions. All communications are indexed on our website, in the "[Ethics Liaison/Compliance Officer Corner](#)."

¹ This booklet will refer to Compliance Officers and Liaisons as "Ethics Liaisons."

STATEMENTS OF FINANCIAL INTERESTS

Role of Ethics Liaison Concerning Statements of Financial Interests

Each year approximately 2,500 elected officials and state employees are designated by statute ([Section 1-83\(a\)\(1\)](#)) or by their agency head based on a standard established by the Governor to file a Statement of Financial Interests (“SFI”) with the Office of State Ethics. The SFI is due annually by May 1. The OSE can impose a penalty of up to \$10 per day for each day the filing is late, not to exceed \$10,000. The Ethics Liaison provides internal assistance at his or her state agency and is responsible for updating and maintaining the SFI Filing System for his or her agency.

Policy

Statements of Financial Interests serve as a tool to maximize public confidence in governmental decision making. The policy underlying this requirement has been in effect since the enactment of the Ethics Codes in 1977. An SFI provides a checklist or reminder to the official/employee to be mindful of potential conflicts of interest, and it provides a baseline of information which can be compared to subsequent years for the purpose of determining potential misuse of office for financial gain.

Governor Lamont’s Standard

Governor Lamont has established a standard which requires “filing of Annual Statements of Financial Interests by all persons in the Executive Branch and Quasi-Public Agencies who exercise (i) significant policy-making, regulatory or contractual authority; (ii) significant decision-making and/or supervisory responsibility for the review and/or award of State contracts; or (iii) significant decision-making and/or supervisory responsibility over staff that monitor State contracts.” (See, [Governor Ned Lamont Standard and Designation Guidelines](#).)

Current Employees

Current employees who are designated filers must file annually by May 1.

1. The designation list for each agency must be updated by the Ethics Liaison by January 15 and the Ethics Liaison should follow-up to ensure that each designee has been notified of their requirement to file.
2. If an agency determines that an individual was erroneously designated, the liaison should update the SFI system and change the filer’s status from “required” to a “non-required” filer.
3. Notify the OSE within ten days, either in writing or by e-mail (sfi.ose@ct.gov) of any organizational changes that affect the designation of positions in the agency.

New Employees

New employees who are designated filers must file a SFI for the previous calendar year.

1. During the recruitment process, the human resources manager or Ethics Liaison shall inform individuals, where applicable, that they will be required to file an SFI. This is critical in the case of board and commission appointees who often receive little compensation for their work. Except where otherwise specified by statute, board and commission members are to be designated by the executive agency or quasi-public agency only if the board or commission expends, or approves expenditure of, public funds and exercises substantial authority of the state.
2. Within ten days after the filer joins the agency, the Ethics Liaison should add the new employee, board member, etc. to the designation list and enter him or her into the filing system. The filer will then receive a temporary password and instructions from the OSE regarding filing.
3. New employees, who assume their designated positions after March 31 must file SFIs for the *preceding* year within 30 days of assuming such positions. New employees, board members, etc. who assume their designated positions between January 1 and March 31 must file SFIs for the *preceding* year by May 1 of that year.

Designated Employees Who Leave Their Position

1. The Ethics Liaison must update the designation list within ten days if a designated SFI employee, board member, etc. leaves state service or the position that required him or her to file an SFI. Each departing individual is required to file a Statement of Financial Interests covering that portion of the year during which the individual held the designated office or position.
2. The OSE is required to notify these individuals of the requirement to file an SFI within 60 days of their departure. Such individuals have 60 days from receipt of this notification to file.
3. Each Ethics Liaison should use his or her best efforts to maintain current home addresses and, if possible, email addresses of departing and former employees. The importance of this cannot be overstated since many late filings, which may result in penalties, are the result of incorrect contact information.

SFI Filing System Resource

Detailed instructions on how to access the filing system to maintain existing filers or to add new filers is available on our website. Please see the "[Guide to the Statements of Financial Interests Filing System for Agency Ethics Liaisons.](#)" The Office of State Ethics will also provide you with technical assistance by phone or e-mail.

ETHICS EDUCATION

Role of Ethics Liaison Concerning Ethics Education

The Ethics Liaison provides assistance and is responsible for coordinating and facilitating the development of ethics policies for their agency as well as conducting or scheduling annual education and training concerning the Code of Ethics.

Pursuant to Section [1-81\(a\)\(5\)](#) of the Connecticut General Statutes the Office of State Ethics shall provide yearly training to all state employees regarding the Code of Ethics.

Code of Ethics Training

In-Person Training

The Office of State Ethics offers in-person training to public officials, state employees, lobbyists, state contractors, and other interested groups. To schedule a training workshop, please fill out the [Training Request Form](#) or contact the OSE at 860-263-2400.

Online Training

The interactive, [online training](#) course provides an independent training module for existing and new employees to meet their annual training requirement. Those who finish this training will receive a printable certificate to verify course completion.

Web-Streaming Video

The [web-streaming video](#) version of our comprehensive ethics training features presentations from numerous OSE staff members regarding the provisions of the Code of Ethics. This training can be viewed as a whole, or in parts that cover specific sections of the law.




Agency Training Tools

The following materials are available on our website ct.gov/ethics
Click on "[Ethics Training](#)" in the Left Hand Navigation

Ethics Posters for use by Connecticut State Agencies *Print and Place in Agency Bulletin*

- | | |
|---|---|
|  Public Service |  Impartiality |
|  Outside Employment |  Gift Acceptance |
|  Gratuities from Contractors |  Widely Attended |
|  Seeking Employment Poster |  Post Employment |

Guides for Public Officials and State Employees

-  [Code of Ethics for Public Official and State Employees](#)
-  [Necessary Expenses and Gifts to the State Guide](#)
-  [Legislator Guide to the Code of Ethics](#)

Guide for State Contractors

-  [Guide to the Code of Ethics for Current or Potential State Contractors](#)

Annual Report to Governor Lamont

-  [Annual Report to Governor Lamont for Calendar Year 2019](#)

Conflict of Interest Form

-  [Disclosure of Conflict of Interest](#)

Ethics Complaints

-  [Citizen's Guide to Filing a Complaint](#)
-  [Complaint Form](#)

ETHICS ENFORCEMENT

Role of Ethics Liaison Concerning Ethics Enforcement

The Ethics Liaison provides assistance and is responsible for providing information to employees regarding provisions in the Code of Ethics as well as maintaining communication with our Enforcement Division.

Mandatory Reporters

The Code contains mandatory reporting requirements for the following individuals when they have “reasonable cause to believe that a person has violated” the Code of Ethics for Public Officials:

- Commissioners and Deputy Commissioners;
- State Agency Heads and Deputy Heads;
- Quasi-public Agency Heads and Deputy Heads; and
- Persons in charge of state agency procurement, contracting or human resources.

These individuals are required to report a belief that a person has violated the Code of Ethics to the Office of State Ethics. Typically, the report is made in writing addressed to the Ethics Enforcement Officer. The individual may also file an ethics complaint. (Note: Ethics Compliance Officers and Ethics Liaisons are *not* mandatory reporters. However, it is not uncommon for the reporting requirement to be delegated to the Compliance Officer or Ethics Liaison.)

Enforcement Procedures and Penalties

Enforcement of the Code is initiated by a complaint, filed by any member of the public or the Ethics Enforcement Officer. In most cases, a complaint by the Ethics Enforcement Officer is preceded by a confidential staff evaluation.

A complaint must comply with certain requirements. These requirements, along with a comprehensive overview of the complaint process, are contained in the [Citizen's Guide to Filing a Complaint](#).

The two most important items to remember are:

- A complaint must be filed on the prescribed agency form, available under the Forms tab on the Office of State Ethics website. Even though the Enforcement Division receives many anonymous ‘tips’ for review, only a formal complaint initiates a formal action; and

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- Any complaint alleging a violation of the Codes of Ethics will remain **confidential** except:
 - ✓ After a judge trial referee makes a finding of probable cause (a determination by a judge trial referee that there is probable cause to believe that a public official, state employee, or lobbyist has violated a provision of the Codes);
 - ✓ Upon request of the respondent; or
 - ✓ Upon an agreed resolution of the matter by consent order.

Likewise, any investigation conducted prior to finding of probable cause remains confidential except upon the request of the respondent. This means that the allegations in the complaint and any information supplied to or received from the Office of State Ethics during the investigation will not be disclosed to any third party. **While the investigation is confidential, no one – the complainant, respondent, witnesses, designated party, Office of State Ethics Board member, Office of State Ethics staff member – may disclose that a complaint has been filed, or any information related to the investigation of the complaint.**

See [Advisory Opinion 2007-9](#), which details these confidentiality requirements while keeping a complainant's right to disclose the facts that formed the basis of the complaint.

A two-stage process follows:

1. Confidential investigation and confidential probable cause hearing; and
2. If probable cause is found, a public hearing to determine if a violation has occurred.

At any stage of this process, the Office of State Ethics and the Respondent may negotiate a settlement.

After a finding or admission of a violation, the Citizen's Ethics Advisory Board ("Board") can order the Respondent to comply with the Code in the future, file any required report or statement, and/or pay a civil penalty of up to \$10,000 per violation. The Office of State Ethics may refer matters to the Chief State's Attorney for criminal prosecution.

Role of Ethics Liaison in Enforcement Proceedings

In the course of many confidential investigations, the Ethics Liaison plays a critical role in facilitating the gathering of information requested by the Ethics Enforcement Division. The Ethics Liaison will typically be the first person at the agency contacted by the Enforcement Division. Throughout the investigative process the Ethics Liaison must keep any investigation confidential.

ETHICS COMPLIANCE

Role of Ethics Liaison Concerning Ethics Legal Advice

The Ethics Liaison provides assistance and is responsible for providing information to employees regarding provisions in the Code of Ethics as well as maintaining communication between our Legal Compliance Division.

Requesting Legal Advice

Informal Advice

Any person may at any time request informal advice, either oral or in writing, regarding the Code of Ethics for Public Officials or the Code of Ethics for Lobbyists.

How to Request Informal Advice

Call the Office of State Ethics Legal Compliance Division for informal advice at (860) 263-2400.

The Legal Compliance Division provides advice and opinions regarding the Code of Ethics to the regulated community, which includes public officials and state employees, lobbyists, and all state contractors.

Submit your request in writing to the Office of State Ethics Legal Division for informal written advice:

Fax: **(860) 263-2402**
Email: ethics.code@ct.gov

Mail/hand deliver to:

**Office of State Ethics
18-20 Trinity Street, Suite 205
Hartford, CT 06106-1660**

How is the Request Processed?

A request will be assigned to an attorney in the Office of State Ethics legal division who will issue informal staff advice only when formal advisory opinions have established precedent or the law is clear. If the Office of State Ethics General Counsel determines, for example, that the question has not been previously answered, the individual making the request will be asked to submit a request for an advisory opinion to the Citizen’s Ethics Advisory Board.

Advisory Opinion

Request an Advisory Opinion

Any person subject to the Code of Ethics for Public Officials or the Code of Ethics for Lobbyists may at any time request an advisory opinion as to the applicability of any statute, regulation or order enforced, administered or promulgated by the Citizen's Ethics Advisory Board.

How to Request an Advisory Opinion

Requests for an Advisory Opinion must be sent by mail or delivered in person during normal business hours and addressed to:

**Citizen's Ethics Advisory Board
Office of State Ethics
18-20 Trinity Street, Suite 205
Hartford, CT 06106-1660**

The Request for an Advisory Opinion must:

- Be a signed original;
- Provide your address;
- State clearly and concisely the substance and nature of the request;
- If possible, identify the statute, regulation, or order concerning which the request is made, including the particular aspect thereof to which the request is directed; and
- Be accompanied by a statement of any facts and arguments that support your position.

How is the Request for an Advisory Opinion Processed?

If the Citizen's Ethics Advisory Board grants a request for an advisory opinion, it has 60 days to (1) issue the opinion, (2) agree to issue the opinion by a specific date, or (3) order the matter set for a hearing.

If a request is granted, the legal division of the Office of State Ethics will draft an advisory opinion and provide a copy to petitioner before the meeting at which it will be considered by the Citizen's Ethics Advisory Board (giving petitioner time to respond to it, if necessary).

The petitioner will be advised of the date, time, and place of the meeting at which the draft advisory opinion will be considered by the Citizen's Ethics Advisory Board, and will be notified that he or she may attend the meeting and make a presentation to the Citizen's Ethics Advisory Board.

If the Citizen's Ethics Advisory Board denies a request for an advisory opinion (e.g., if the facts presented in a petition are similar to those already addressed in a prior advisory opinion), the Board has 60 days from the request's filing to either state the reasons for its denial or initiate regulation-making proceedings on the subject.

Who will be Notified of the Request?


The Citizen's Ethics Advisory Board may notify any person of such a request, and may receive and consider facts, arguments and opinions from persons other than petitioner.

Within 30 days of the request for an Advisory Opinion, the Office of State Ethics legal division will notify the subject of the request, if the subject is not the petitioner (e.g., when a department head requests an advisory opinion regarding an employee of the department), and any other person to whom notice is required by law.

Whenever the subject of the request is a public official or state employee, the Office of State Ethics legal division will, within 30 days of the request for an Advisory Opinion, give notice of the petition to the official's or employee's department, agency, board, or commission.

Will the Advisory Opinion be Public?

Yes. The Citizen's Ethics Advisory Board is statutorily mandated to publish such advisory opinions in the Connecticut Law Journal. Advisory opinions are also published on the Office of State Ethics website ct.gov/ethics.

-  [Summaries](#)
-  [Indexed by Topic](#)
-  [Indexed by Year 1993 - Present](#)
-  [Advisory Opinions 1978-1992](#)

What is the Effect of an Advisory Opinion?

Advisory opinions, until amended or revoked, are binding on the Citizen's Ethics Advisory Board and are deemed to be final decisions of the board for purposes of appeal to the superior court, in accordance with the provisions of General Statutes §§ [4-175](#) or [4-183](#).

Any advisory opinion concerning the person who requested the opinion and who acted in reliance thereon, in good faith, is binding on the Citizen's Ethics Advisory Board. It is an absolute defense in any criminal action brought under the Codes' provisions, provided that the accused acted in reliance upon such advisory opinion.

Declaratory Ruling

Request a Declaratory Ruling

Any person who is not eligible to receive an Advisory Opinion (i.e., any person who is not subject to the provisions of the Code of Ethics for Public Officials or the Code of Ethics for Lobbyists).

How to Request a Declaratory Ruling

Requests for a Declaratory Ruling must be sent by mail or delivered in person during normal business hours and addressed to:

**Citizen's Ethics Advisory Board
Office of State Ethics
18-20 Trinity Street, Suite 205
Hartford, CT 06106-1660**

The Request for a Declaratory Ruling must:

- Be signed;
- Be in writing and include the factual background of the issue;
- Be signed by petitioner and include his or her address for purpose of reply;
- Be sent by certified mail to any person the petitioner has reason to believe may not otherwise have knowledge thereof and may fairly have an interest therein;
- State clearly the question upon which it seeks a ruling;
- State petitioner's position with respect to the question;
- Include argument (if any) in support of petitioner's position, with such legal citations as are considered appropriate.

How is the Request Processed?

If the Citizen's Ethics Advisory Board grants a request for a declaratory ruling, it has 60 days to (1) issue the opinion, (2) agree to issue the opinion by a specific date, or (3) order the matter set for a hearing.

If a request is granted, the legal division of the Office of State Ethics will draft a declaratory ruling and provide a copy to petitioner before the meeting at which it will be considered by the Citizen's Ethics Advisory Board (giving petitioner time to respond to it, if necessary).

Petitioner will be advised of the date, time, and place of the meeting at which the draft declaratory ruling will be considered by the Citizen's Ethics Advisory Board, and notified that he or she may attend the meeting and make a presentation.

If the Citizen's Ethics Advisory Board denies a request for a declaratory ruling (e.g., if the facts presented in a petition are similar to those already addressed in a prior declaratory ruling), it has 60 days from the request's filing to either state the reasons for its denial or initiate regulation-making proceedings on the subject.

Who will be Notified of the Request?

The Citizen's Ethics Advisory Board may notify any person of such a request, and may receive and consider facts, arguments and opinions from persons other than petitioner.

Within 30 days of requesting a Declaratory Ruling, the Office of State Ethics legal division will notify the subject of the request, if the subject is not the petitioner (e.g., when a member of the public requests a declaratory ruling regarding a state official), and any other person to whom notice is required by law.

Whenever the subject of the request is a public official or state employee, the Office of State Ethics legal division will, within 30 days of requesting a Declaratory Ruling, give notice of the petition to the official's or employee's department, agency, board, or commission.

Will the Declaratory Ruling be Public?

Yes. Declaratory rulings are published in the Connecticut Law Journal and on the Office of State Ethics website ct.gov/ethics.



[Summaries](#)



[Indexed by Topic](#)



[Indexed by Year 1978 - Present](#)

What is the Effect of a Declaratory Ruling?

Declaratory rulings are “final decisions” of the Citizen's Ethics Advisory Board for purposes of appeal to the superior court, in accordance with the provisions of General Statutes §§ [4-175](#) or [4-183](#).

ETHICS SELF AUDIT

Ethics Liaisons Best Practices

The Office of State Ethics has developed this voluntary self-audit to assist you in the development of best practice management strategies in relation to the Code of Ethics. Based on the Code of Ethics, the self-audit is intended to assist you in thinking about your ethics-related leadership. You are to be commended for taking time out of your busy schedule to complete it.

The audit areas of review are: Education, Agency Ethics Policies, Liaison Communication, Ethics Advice, Conflicts of Interest, Statements of Financial Interests and Reporting. We believe that you will achieve high ethical standards for your agency as you continue to audit and monitor your agency practices against the Code of Ethics requirements.

Ethics Education - Annual Training Requirements

Requirement	How do you/your agency comply with this requirement?	Date Last Completed?	Action Items
Provide and/or schedule annual training for existing employees			
Provide and/or schedule training for new employees			
Provide access to training materials and guidebooks			
Maintain documentation of completion of annual ethics education for each employee			

Agency Ethics Policies

Requirement	How do you/your agency comply with this requirement?	Date Last Completed?	Action Items
Develop and maintain agency ethics policy			
Submit to the Office of State Ethics and to DAS an updated ethics policy as required by statute			
Provide ethics policy to existing and new employees			

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Provide post-employment rules to departing employees			
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Ethics Liaison Communication

Requirement	How do you/your agency comply with this requirement?	Date Last Completed?	Action Items
Receive monthly communications via e-mail from the Office of State Ethics and distribute key information to employees			
Routinely visit the Office of State Ethics website and the "Ethics Liaison / Compliance Officer Corner"			
Print ethics posters and placed them on agency bulletin boards			

Ethics Advice

Requirement	How do you/your agency comply with this requirement?	Date Last Completed?	Action Items
Employees know that you are the Ethics Liaison/ Compliance Officer and will contact you for ethics advice			
Familiar with the Code of Ethics and the process for obtaining legal compliance advice from the Office of State Ethics			
Familiar with the Code of Ethics and the process for filing a complaint with the Office of State Ethics			

Conflicts of Interest

Requirement	How do you/your agency comply with this requirement?	Date Last Completed?	Action Items
Develop a system to identify Conflicts of Interest			

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Maintain documentation of decisions made concerning Conflicts of Interest			
Periodic review of Office of State Ethics Conflict of Interest Decisions			

Statements of Financial Interests

Requirement	How do you/your agency comply with this requirement?	Date Last Completed?	Action Items
Maintain the SFI list, in a timely manner and make certain that filers are notified of filing requirements			
Notify the Office of State Ethics within ten days of any designation changes in your agency			
During the recruitment process, new employees who will be required to file an SFI are notified of the requirement			
New employees that are required to file are added to the SFI system within ten days			
Departing employees are informed of their requirement to submit a departing official SFI			
Update the SFI system within ten days if a designated filer leaves state service or the position that required him/her to file			
Maintain and update home addresses and email address of departing and former employees			

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Reporting

Requirement	How do you/your agency comply with this requirement?	Date Last Completed?	Action Items
Educate your agency head regarding the mandatory obligation to report violations			
Develop a protocol as to how violations are reported			
Develop a system to be able to identify when a matter may be a violation of the Code of Ethics			

CONNECTICUT GENERAL STATUTES

Section 1-83. Statements of financial interests. Filing requirements. Ethics statements. (a)(1) All state-wide elected officers, members of the General Assembly, department heads and their deputies, members or directors of each quasi-public agency, members of the Investment Advisory Council, state marshals and such members of the Executive Department and such employees of quasi-public agencies as the Governor shall require, shall file, under penalty of false statement, a statement of financial interests for the preceding calendar year with the Office of State Ethics on or before the May first next in any year in which they hold such an office or position. If, in any year, May first falls on a weekend or legal holiday, such statement shall be filed not later than the next business day. Any such individual who leaves his or her office or position shall file a statement of financial interests covering that portion of the year during which such individual held his or her office or position. The Office of State Ethics shall notify such individuals of the requirements of this subsection not later than sixty days after their departure from such office or position. Such individuals shall file such statement not later than sixty days after receipt of the notification.

(2) Each state agency, department, board and commission shall develop and implement, in cooperation with the Office of State Ethics, an ethics statement as it relates to the mission of the agency, department, board or commission. The executive head of each such agency, department, board or commission shall be directly responsible for the development and enforcement of such ethics statement and shall file a copy of such ethics statement with the Department of Administrative Services and the Office of State Ethics.

(b) (1) The statement of financial interests, except as provided in subdivisions (2) and (3) of this subsection, shall include the following information for the preceding calendar year in regard to the individual required to file the statement and the individual's spouse and dependent children residing in the individual's household: (A) The names of all businesses with which associated; (B) all sources of income, including the name of each employer, with a description of the type of income received, in excess of one thousand dollars, without specifying amounts of income; (C) the name of securities in excess of five thousand dollars at fair market value owned by such individual, spouse or dependent children or held in the name of a corporation, partnership or trust for the benefit of such individual, spouse or dependent children; (D) the existence of any known blind trust and the names of the trustees; (E) all real property and its location, whether owned by such individual, spouse or dependent children or held in the name of a corporation, partnership or trust for the benefit of such individual, spouse or dependent children; (F) the names and addresses of creditors to whom the individual, the individual's spouse or dependent children, individually, owed debts of more than ten thousand dollars; (G) any leases or contracts with the state or a quasi-public agency held or entered into by the individual or a business with which he or she was associated; and (H) the name of any of the following that is a partner or owner of, or has a similar business affiliation with, the business included under subparagraph (A) of this subdivision: (i)

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Any lobbyist, (ii) any person the individual filing the statement knows or has reason to know is doing business with or seeking to do business with the state or is engaged in activities that are directly regulated by the department or agency in which the individual is employed, or (iii) any business with which such lobbyist or person is associated.

(2) The statement of financial interests filed by state marshals shall include only amounts and sources of income earned in their capacity as state marshals.

(3) In the case of securities in excess of five thousand dollars at fair market value held within (A) a retirement savings plan, as described in Section 401 of the Internal Revenue Code of 1986, or any subsequent corresponding internal revenue code of the United States, as amended from time to time, (B) a payroll deduction individual retirement account plan, as described in Section 408 or 408A of said Internal Revenue Code, (C) a governmental deferred compensation plan, as described in Section 457 of said Internal Revenue Code, or (D) an education savings plan, as described in Section 529 of said Internal Revenue Code, the names of such securities shall not be required to be disclosed in any statement of financial interests and only the name of such retirement savings plan, individual retirement account plan, deferred compensation plan or education savings plan holding such securities shall be required.

(c) The statement of financial interests filed pursuant to this section shall be a matter of public information, except the list of names, filed in accordance with subparagraph (F) of subdivision (1) of subsection (b) of this section shall be sealed and confidential and for the use of the Office of State Ethics only after a complaint has been filed under section 1-82 and such complaint has been determined by a vote of the board to be of sufficient merit and gravity to justify the unsealing of such list or lists and not open to public inspection unless the respondent requests otherwise. If the board reports its findings to the Chief State's Attorney in accordance with subsection (c) of section 1-88, the board shall turn over to the Chief State's Attorney such relevant information contained in the statement as may be germane to the specific violation or violations or a prosecutorial official may subpoena such statement in a criminal action. Unless otherwise a matter of public record, the Office of State Ethics shall not disclose to the public any such subpoena which would be exempt from disclosure by the issuing agency.

(d) Any individual who is unable to provide information required under the provisions of subdivision (1) of subsection (b) of this section by reason of impossibility may petition the board for a waiver of the requirements.

Section 1-101pp. Reporting of ethics violations by state or quasi-public agency heads or deputies and persons in charge of state agency procurement, contracting or human resources. Any commissioner, deputy commissioner, state agency or quasi-public agency head or deputy, or person in charge of state agency procurement, contracting or human resources, who has reasonable cause to believe that a person has violated the provisions of the Code of Ethics for Public Officials set forth in part I of this chapter or any law or regulation concerning ethics in state contracting shall report such belief to the Office of State Ethics, which may further

Guide for Agency Ethics Liaisons and Compliance Officers

report such information to the Auditors of Public Accounts, the Chief State's Attorney or the Attorney General.

Section 1-101rr. State agency ethics compliance officers. Duties. Liaisons. (a) Each state agency and quasi-public agency that is a party to a large state construction or procurement contract or is planning such a contract shall appoint an ethics compliance officer. Such officer shall be responsible for the development of the ethics policies of such agency, coordination of ethics training programs for such agency and monitoring of programs of such agency for compliance with the ethics policies of the agency and the Code of Ethics for Public Officials set forth in part I of this chapter. At least annually, each ethics compliance officer shall provide ethics training to agency personnel involved in contractor selection, evaluation and supervision. Such training shall include a review of current ethics laws and regulations and discussion of ethics issues concerning contracting. Any contractor and employee of such agency shall provide any requested information to such ethics compliance officer.

(b) Each other state agency and quasi-public agency shall designate an agency officer or employee as a liaison to the Office of State Ethics. The liaison shall coordinate the development of ethics policies for the agency and work with the Office of State Ethics on training on ethical issues for agency personnel involved in contracting.

2019 Public Act Concerning Statements of Financial Interests

The following agency proposal was passed by the Connecticut General Assembly:

SENATE BILL 1039

PUBLIC ACT 19-2

AN ACT CONCERNING THE CONFIDENTIALITY OF STATEMENTS OF FINANCIAL INTEREST

Existing law requires certain public officials and state employees to annually file financial interest statements that identify certain assets and liabilities held by them, their spouses, and dependent children. This act exempts the names of dependent children residing in the filer's household from public disclosure under the Freedom of Information Act.

CONTACT US



Agency Address: Connecticut Office of State Ethics
18-20 Trinity Street
Suite 205
Hartford, CT 06106

Telephone: 860-263-2400

Facsimile: 860-263-2402

Website: ct.gov/ethics

Business Hours: 8:00 am to 5:00 pm

Visitors must enter the building through the door next to the Bushnell Memorial Theater.

Specific E-mail Contacts: For the timeliest responses, please be sure to direct your questions to the appropriate e-mail address; for example, with a question such as, "Can I accept this outside position with a vendor?" please be sure to send your query to ethics.code@ct.gov

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| ➤ Legal Advice Regarding Code of Ethics | ethics.code@ct.gov |
| ➤ Lobbyist Filing/Reporting Questions | lobbyist.ose@ct.gov |
| ➤ Public Official Filing/Reporting Questions | sfi.ose@ct.gov |
| ➤ Enforcement/Filing a Complaint | ethics.enforcement@ct.gov |
| ➤ All Other Inquiries | ose@ct.gov |

[Staff Phone Number Listing](#)