



STATE OF CONNECTICUT

GOVERNOR NED LAMONT

Dear Commissioners and Agency heads:

High ethical standards among our public servants in all branches of government are essential to preserving the public trust and to maintaining an ethical culture. We are proud that Connecticut has been recognized as a national leader in transparency and accountability, according to the State Integrity Investigation done in partnership with the Center for Public Integrity, Global Integrity and Public Radio International.

Every year, approximately 2,500 elected officials and state employees file Statements of Financial Interests ("SFI") with the Office of State Ethics. SFIs serve as a reminder to the public official of potential conflicts of interest and as a tool to maximize public confidence in governmental decision making.

SFIs must be filed by those officials mandated by statute or by individuals who are designated by their agency head. The following overview will provide you with the governor's standard and the guidelines for designating individuals to file SFIs.

If you have specific questions, contact the Office of State Ethics at (860) 263-2400.

Thank you for your cooperation and commitment to maintaining a high ethical standard in state government.

Sincerely,

A handwritten signature in black ink that reads "Ned Lamont".

Ned Lamont
Governor

TABLE OF CONTENTS

Office of State Ethics	4
Introduction	4
Citizen's Ethics Advisory Board	4
Statements of Financial Interests	5
Policy	5
Governor's Standard	5
Statutory Authority	5
Guidelines for Designation	6
Who Should be Designated?	6
Ethics Liaison	8
Statutory Duties and Responsibilities	8
Role of Ethics Liaison Concerning Statements of Financial Interests	8
Current Employees	8
New Employees	9
Designated Employees Who Leave Position	9
Agency Ethics Liaison List	9
Contact Us	10

OFFICE OF STATE ETHICS

Introduction

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 www.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

STATEMENTS OF FINANCIAL INTERESTS

Policy

Statements of Financial Interests (“SFIs”) 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 adopted the established 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.”

Statutory Authority

General Statutes Sec. 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.

GUIDELINES FOR DESIGNATION

Who Should Be Designated?

By January 15 annually, the agency head shall designate the individuals specifically mandated to file SFIs pursuant to section 1-83(a)(1) of the General Statutes as well as those designated pursuant to the Governor's Standard as follows:

1. The executive or administrative head of each agency, authority, board, bureau, commission, council, department, division, or other entity within the Executive Branch, including any quasi-public agency.
2. Any person who reports directly to the executive or administrative head specified in #1 and who exercises authority pursuant to the Governor's Standard or to whom such authority has been delegated.
3. The head of any administrative unit, whether established by statute or administrative action, who has primary responsibility for:
 - a. a geographic region;
 - b. contracting or procurement;
 - c. inspecting, licensing, regulating, or auditing any person or entity;
 - d. interpreting or enforcing laws, rules or regulations; or who has substantial responsibility requiring the exercise of discretion and independent judgment.
4. Any person who actually assumes the above responsibility of any of the positions designated herein for more than thirty consecutive days, not including exercising such authority by virtue of acting during a normal vacation or sick leave period in such a position.
5. The members, officers, and employees of state boards, commissions, and quasi-public agencies if they have the authority to expend, or to approve expenditure of, public funds (other than to authorize payments or increases of state employee salaries or to approve reimbursements for expenses), or if they have authority to recommend any particular private company or person for a state contract exceeding \$10,000, or authority to recommend the standards for such state contract.
6. Any consultant or independent contractor employed by, or whose services have been engaged by the agency or other entity, described in item (1) above, if he or she exercises the same or similar authority as any person in a designated position as described herein or who otherwise holds a position which exercises any of the functions, in whole or in part, of any position set forth herein.

Governor Lamont's Standard and Designation Guidelines

7. Any person who is a voting member of any committee that, during the calendar year, votes on, awards, or approves a contract to expend public funds of \$10,000 or more.
8. Any person who is a voting member of any committee that, during the calendar year, votes on or otherwise selects any persons or entities to be on a "pre-approved" list of potential contractors for future or present contracts with the agency, the state, or any political subdivision of the state.
9. Any person in the "senior executive service" as defined by General Statutes [§ 5-196](#) (31) who is not otherwise identified as a designated filer in these guidelines.
10. Any person holding a position that is exempt from classified service pursuant to General Statutes [§ 5-198](#) (5), (7), (9), (10), (11), (14), (18), (22), (26), and (28) and who exercises authority pursuant to the Governor's Standard or to who such authority has been delegated.
11. Any employee or officer of a quasi-public agency who reports directly to the executive director, or the board, of such quasi-public agency, and whose position includes either: (a) decision-making authority; or (b) any managerial authority over other quasi-public agency employees or contractors.
12. Any employee in a designated position who occupied a position for 30 days or more in the calendar year even if they have left state service. This requirement applies regardless of the conditions of termination: voluntary, retirement lay off, etc. If an employee is deceased, notify the OSE and the individual will be removed from the designation list immediately. The family of the deceased employee is not required to file an SFI.
13. Any vacant positions if they satisfy the definition of "substantial policy-making positions."

Please keep in mind that the decision to designate individual SFI filers pursuant to the Governor's Standard is made by each agency head not by the Office of State Ethics or the Office of the Governor. Requests for changes in designation must be made with the agency head.

ROLE OF AGENCY ETHICS LIAISON

Duties and Responsibilities

General Statutes [Section 1-101rr](#).

(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.

Role of Ethics Liaison Concerning Statements of Financial Interests

The designated ethics liaison provides internal assistance and is responsible for updating and maintaining the SFI Filing System for his or her agency.

Current Employees

1. The designation list must be updated by the agency ethics liaison by January 15, and the Agency Ethics liaison should follow-up 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

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, the ethics liaison should add the new employee to the designation list and enter them into the filing system. The filer will then receive a temporary password and instructions.
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 who assume their designated positions between January 1 and March 31 must file SFIs for the *preceding* year by May 1.

Designated Employees Who Leave Their Position

1. The ethics liaison must update the designation list within ten days if a designated SFI employee leaves state service or the position that required him or her to file an SFI. The departing individuals are required to file a Statement of Financial Interests covering that portion of the year during which such individuals 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 and 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 are the result of incorrect contact information.

Agency Ethics Liaison List

[List of Ethics Liaisons and Compliance Officers](#)

CONTACT US



Agency Address: Connecticut Office of State Ethics
165 Capitol Avenue
Suite 1200
Hartford, CT 06106

Telephone: 860-263-2400

Facsimile: 860-263-2402

Website: www.ct.gov/ethics

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

Specific E-mail Contacts: For the timeliest responses, please be sure to direct your questions to the appropriate e-mail address.

- | | |
|--|--|
| ➤ 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 Inquires | ose@ct.gov |