



February 5, 2026

To: The Honorable Matt Ritter, Speaker of the House of Representatives
The Honorable Martin M. Looney, President Pro Tempore of the Senate
The Honorable Jason Rojas, Majority leader of the House of Representatives
The Honorable Bob Duff, Majority Leader of the Senate
The Honorable Vincent Candelora, Minority Leader of the House of Representatives
The Honorable Stephen Harding, Minority Leader of the Senate

Re: Report on state mandate enacted during the November, 2025 Special Session of the General Assembly
Prepared by the Advisory Commission on Intergovernmental Relations

Attached please find the Advisory Commission on Intergovernmental Relations (ACIR) report on state mandate enacted during the November, 2025 Special Session, prepared in accordance with CGS Sec. 2-32c. The report will be distributed separately to the chief elected official of each municipality.

CGS Sec. 2-32c directs the speaker and the president pro tempore, not later than five days after receipt of the report, to refer each state mandate to the joint standing committee or select committee of the General Assembly having cognizance of the subject matter of the mandate. Due to the often sweeping changes to bills after approval by their original committee of cognizance, and the increasing preponderance of omnibus bills addressing many different subjects, the ACIR proactively sends the report to all General Assembly members through the House and Senate clerks and will continue to do so.

The ACIR is a 25-member agency of the State of Connecticut created in 1985 to study system issues between the state and local governments and to recommend solutions as appropriate. The membership is designed to represent the state legislative and executive branches, municipalities and other local interests, and the general public.

If you have any comments, questions, or suggestions, please feel free to contact us at acir@ct.gov.

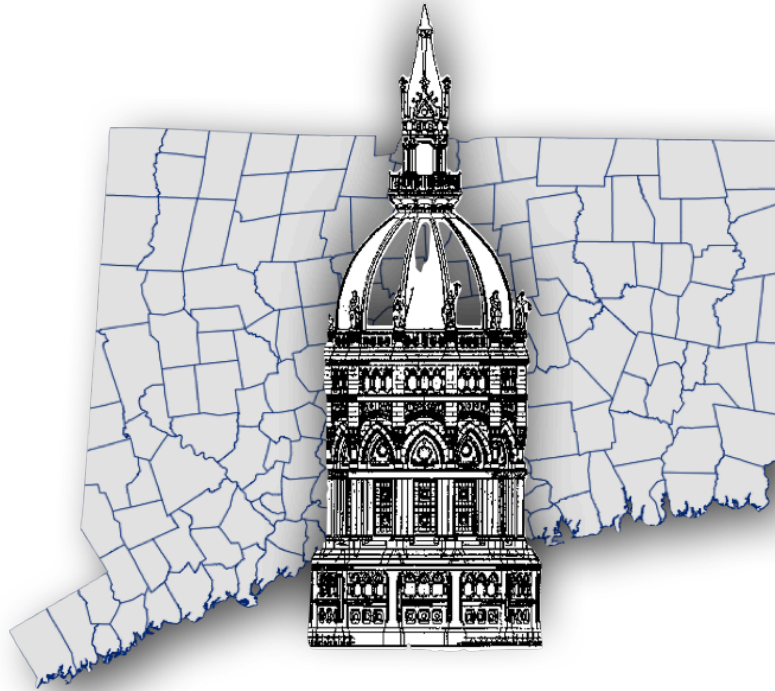
Sincerely:

Matt Hart, Chair designate

Stephen Stephanou, Vice Chair

Cc: Michael Jefferson, Clerk of the Senate
Frederick Jortner, Clerk of the House

State Mandates on Local Government: Actions in 2025, Nov. Special Session



a report by the

Connecticut Advisory Commission on
Intergovernmental Relations

<https://portal.ct.gov/acir>

acir@ct.gov

February 5, 2026

ADVISORY COMMISSION ON INTERGOVERNMENTAL RELATIONS

Commission Membership

Officers

Matt Hart, Chair
Stephen Stephanou, Vice Chair

Capitol Region Council of Governments (CRCOG)
Town of Manchester

Members

Kevin Coughlin
Brendan Sharkey
James O’Leary
Michael Downes
Martin Heft
Brie Wolf
Keith Norton
Harrison Nantz
Hon. Irene Haines
Brian Foley
Vacant
Bridget Fox
Thomas Gaudett
Lon Seidman
Jan Perruccio
Matt Hart
Zak Leavy
Eric Protulis
Michael Curley
Samuel Gold
Carl Amento
Francis Pickering
Ronald Thomas
Karl Kilduff

Designee of Senate President Pro Tempore
Designee of Speaker of the House of Representatives
Designee of Senate Minority Leader
Designee of House Minority Leader
Designee of Secretary of Office of Policy & Management
Designee of Comm. of Economic and Community Dev.
Designee of Comm. of Education
Designee of Comm. of Energy and Environ. Protection
Town of East Haddam
Town of Tolland
Official from town of 20,000-60,000, nominated by CCM
City of Stamford
City of Bridgeport
Connecticut Association of Boards of Education
Connecticut Association of Public School Superintendents
Connecticut Association of Councils of Governments
Organized labor, appointed by Governor
Public Member, appointed by Governor
Public Member, appointed by Senate Pres. Pro Tempore
Public Member, appointed by Senate Minority Leader
Public Member, appointed by Speaker of House of Rep.
Public Member, appointed by House Minority Leader
Designee of CT Conference of Municipalities (CCM)
Designee of the Council of Small Towns (COST)

Executive Summary

The Advisory Commission on Intergovernmental Relations (ACIR) has identified and reviewed state mandates arising from the November 2025 special legislative session. The session was scheduled too late for resulting mandate actions to be described in the regular session report that was due November 15. The ACIR has sometimes in the past addressed late special session mandate actions in the following year's regular session report, but the high level of public attention to one of the special session bills seems to warrant a more immediate report.

Two public acts passed in the special session included one or more sections that the ACIR considers to be a mandate, resulting in a total of 22 such bills in 2025. One of those acts also included sections that will have the impact of a mandate on municipalities, but do not specifically target municipalities. That results in a total of 12 such bills for the year. The ACIR also tracks mandate reductions, which are legislation providing relief from existing mandates. One special session public act repealed two sections of statutes imposing mandates but created comparable requirements elsewhere. The ACIR does not identify such a bill as providing mandate relief. Nine bills providing mandate relief had been passed in 2025's regular session.

Mandates can have impacts that are not recognized during the rush of a legislative session or even when the ACIR later reviews the resulting public and special acts. We believe different municipalities can be impacted differently by the same mandate depending on their staffing, structure of government, and other factors, not all of which are clear at this time. The mandate analysis and reporting required of the ACIR by [CGS Sec. 2-32c](#) and [2-79a](#) can do little more than identify the potential for municipal impacts and, to some extent, is duplicative of mandate reviews performed by municipal or education organizations and others.

Recent ACIR reports mention the commission's interest in a more focused study of mandates, what members refer to as a "deep dive." The ACIR is collaborating with other organizations to study a few previously enacted mandates to learn how the impacts compare with predictions at the time of mandate adoption and how impacts vary among municipalities. The ACIR believes deep dives, even just a few per year, will assist state leaders in refining new requirements to reduce local costs of achieving statewide policy goals. Our municipalities and the state will benefit when activities that are more appropriately handled at the municipal level can be achieved at lower local cost.

Acknowledging the burden created by a mandate does not deny the potential benefits of the action being mandated. The ACIR believes the political process should fully consider those costs along with the anticipated benefits. No matter how worthwhile they might be, mandates constrain municipalities and can oblige them to raise funds or change their priorities. The assignment of responsibility for actions having both local and statewide significance and responsibility for the resulting costs will continue to be the subject of much debate.

Finally, as pointed out in each edition of this report, the ACIR's listings of statutes and public or special acts imposing mandates should not be considered a hit list of legislation to be repealed. It can be appropriate from a legal and from a practical standpoint for the state to impose mandates. Municipalities operate under a limited delegation of authority by the state and there can be statewide expectations for functions that, from a practical perspective, are best administered and funded locally.

Background

The report is prepared in accordance with Connecticut General Statutes (CGS) [Sec. 2-32c](#) and is based [CGS Sec. 2-32b](#)'s definition of mandate:

"State mandate" means any constitutional, statutory or executive action that requires a local government to establish, expand or modify its activities in such a way as to necessitate additional expenditures from local revenues, excluding any order issued by a state court and any legislation necessary to comply with a federal mandate

Although commonly referred to as “municipal” mandates, the statutory definition is not limited to mandates on what is ordinarily considered municipal. Instead, the definition encompasses mandates on any entity of “local government” as defined in the same section of statutes:

"Local government" means any political subdivision of the state having power to make appropriations or to levy taxes, including any town, city or borough, consolidated town and city or consolidated town and borough, any village, any school, sewer, fire, water or lighting district, metropolitan district, any municipal district, any beach or improvement association, and any other district or association created by any special act or pursuant to [chapter 105](#), or any other municipal corporation having the power to issue bonds

This report is organized on a bill-by-bill basis to focus on the process by which mandates have been considered and adopted. Among other things, the report provides a brief description of each mandate, identifies legislative committees that considered each new or increased mandate, and outlines how the legislature's Office of Fiscal Analysis (OFA) described them.

It must be noted that, although this report identifies legislative committees that reviewed a bill on its path to being passed, the final language might be very different than the language considered by those committees or that members of the public had responded to in committee hearings. Tracking the precise point when mandates were created or eliminated during the legislative process can be a challenge.

The ACIR believes this report identifies all public or special acts that added to or reduced the burden of mandates on local government in 2025's November Special Session but welcomes any suggestions to reconsider such actions that might have been overlooked or misinterpreted. The ACIR maintains on their website a list of the long-term accumulation of mandates; anything overlooked in this report can be incorporated into the compendium to ensure it is recognized.

Discussion & Conclusion

The Discussion and Conclusion sections of the ACIR's State Mandates on Local Government Actions in 2025 [report on the 2025 regular session](#) makes a number of points regarding the study of mandates and their impacts. They will not be repeated here, but the ACIR recommends readers interested in mandates refer to that report. A couple of points, however, do bear repeating.

First, the ACIR approaches the identification of mandates from the perspective that even mandates that might appear insignificant, individually, can have a significant cumulative impact. The ACIR has been told that school districts can have staff who spend much of their

State Legislative Mandates on Local Government: Actions in 2025
a report by the Connecticut Advisory Commission on Intergovernmental Relations

time handling such mandates. Even when considered individually, each additional increment of local staff time or other resources that must be diverted to a new state-imposed task is time or resources no longer available for tasks a municipality or school district might prefer to do.

The ACIR increasingly questions whether the mandate study and reporting required of the commission by [CGS Sec. 2-32c](#) and [CGS Sec. 2-79a](#), achieve the desired results. The ACIR is considering alternatives that might provide municipal and state leaders with more meaningful and actionable information. This year's regular session report, linked above, discusses some of the ACIR's thoughts. Further consideration certainly is necessary, but the ACIR believes a new approach focusing on how town-to-town differences in governance, staffing, local needs, and resources have a more significant effect than recognized and the ACIR believes it would be well positioned to look into that if statutes allow.

The ACIR believes the costs of a mandated action should be considered along with the anticipated benefits and the estimated costs should be reasonably accurate. No matter how worthwhile it might be, a mandate constrains municipalities and can oblige them to raise funds or change their priorities. The assignment of responsibility for actions having both local and statewide significance and for paying the resulting costs will continue to be the subject of much debate.

If there are any questions regarding the enclosed report, please contact the ACIR@ct.gov.

Sincerely,



Matt Hart, Chair designate



Stephen Stephanou, Vice Chair

State Legislative Mandates on Local Government: Actions in 2025
a report by the Connecticut Advisory Commission on Intergovernmental Relations

Index

State Mandates on Local Government: Actions in 2025, Nov. Special Session.....	i
Commission Membership	ii
Executive Summary	iii
Discussion & Conclusion	iv
New State Mandates	1
PA 25-1 (HB 8002) An Act Concerning Housing Growth.....	1
PA 25-3 (HB 8004) An Act Concerning Children's Behavioral Health, A Standard Self-.....	2
Mandates Not Specifically Directed At Municipalities.....	3
PA 25-3 (HB 8004) An Act Concerning Children's Behavioral Health, A Standard Self-.....	3
Appendix A: Mandate Legislation Listed by Committee of Cognizance	3
Emergency Certification	3
Appendix B: Sec. 2-32c. Submission to General Assembly of list of state mandates	4

New State Mandates

PA 25-1 (HB 8002) (Nov. Spec. Sess.) **An Act Concerning Housing Growth**

Mandate Description

Sec. 5 requires municipalities to choose between adopting a municipal housing growth plan or complying with a regional plan; to follow specified procedures if adopting a municipal plan and if a municipal plan is not submitted by the time required. Following state approval of a municipal plan, the municipality must adopt and implement the plan's housing growth policies and submit annual progress reports. A municipality must follow specified procedures if it chooses to hold informational meetings or other activities regarding a proposed plan. Sec. 6 requires municipalities choosing not to adopt a municipal housing growth plan and to instead comply with a regional plan to follow specified procedures, to adopt and implement the regional plan's housing growth policies, and to submit annual progress reports. Sec. 7. requires municipalities to use state-wide data tools to compile an inventory of developable land. Sec. 9 requires zoning commissions adopting regulations to establish a priority housing development zone to include certain allowances or limitations as specified and to submit the regulations to the Dept. of Housing for approval. Sec. 10 requires a municipality that has chosen to request a final letter of eligibility regarding a priority housing development zone to notify DOH of any new historic district or any other modification to that zone. Sec. 11 requires municipal agencies and commissions to take actions or consult with others as specified. It also requires qualified transit-oriented communities to allow listed developments or conversions as of right in a transit-oriented district and to require that proposed development of ten or more units not allowed as of right within a transit-oriented district be subject to an affordability deed restriction as specified. Regulations adopted for transit-oriented districts are required to substantially comply with guidelines adopted by OPM or a qualifying transit-oriented community must seek an exemption as specified. Sec. 15 required to receive funds municipality must be in compliance with the its housing growth plans or the regional plan and demonstrate steps to implement the housing growth policies. Sec. 16 (8-2s) requires zoning regulations to allow transit community or middle housing development on any lot zoned for commercial or mixed-use development as specified. Sec. 19 requires a municipality choosing to establish conservation and traffic mitigation districts to follow specified process in adopting a district and for districts and decisions regarding parking requirements established in them to meet specified criteria. Sec. 26 requires a municipality to investigate and, if confirmed, remove potential violations of this section's ban against public building or structure designs that prevent a person experiencing homelessness from sitting or lying at street level. Sec. 35 (7-148b) increases the number of municipalities subject to the mandate by reducing the municipal population threshold above which a fair rent commission is required from 25,000 to 15,000, but provides options for regional approaches. Sec. 44 (8-68d) increases the mandate by requiring housing authorities provide additional information in annual reports

required by this section. Sec. 45 requires a local fire marshal who determines that a fire hydrant located in a mobile manufactured home park has specified problems to report that finding to the Dept. of Consumer Protection and to the CT Mobile Manufactured Home Advisory Council.

Committee(s) Reviewing Bill

Emergency Certification

Summary of OFA Municipal Fiscal Impact Statement (as relates to the mandate portion of the bill)

OFA reported but did not quantify a number of municipal impacts, including potential costs in Sec. 4-6, potential costs, savings, and grand list changes in Sec. 8-10, and noted the potential grand list impact of Sec. 13. OFA also reported potential cost of Sec. 26 and Sec. 35, potential savings in Sec. 37-39.

PA 25-3 (HB 8004) (Nov. Spec. Sess.)

An Act Concerning Children's Behavioral Health, A Standard Self-Employment Expense Deduction for Temporary Family Assistance, The Telecommunications Surcharge to Support the Firefighters Cancer Relief Program, Courthouse Operations, Data Protection and Procedures for Redistricting and Correcting Districting Errors

Mandate Description

Sec. 12 requires law enforcement authorities to follow specified protocol before detaining, arresting, or otherwise taking individuals into custody on courthouse grounds. Sec. 15 (9-50b) increases the existing mandate by requiring registrars to also update the state-wide centralized voter registration system, to notify the Secretary of State of and correct errors, and to notify voters whose polling place has changed due to such a correction, all as specified.

Committee(s) Reviewing Bill

Emergency Certification

Summary of OFA Municipal Fiscal Impact Statement (as relates to the mandate portion of the bill)

OFA reported no municipal impacts and referred only to the presence or absence of potential state impacts.

Mandates Not Specifically Directed at Municipalities

PA 25-3 (HB 8004) (Nov. Spec. Sess.)

An Act Concerning Children's Behavioral Health, A Standard Self-Employment Expense Deduction for Temporary Family Assistance, The Telecommunications Surcharge to Support the Firefighters Cancer Relief Program, Courthouse Operations, Data Protection and Procedures for Redistricting and Correcting Districting Errors

Mandate Description

Sec. 5 (38a-514b) increases the mandate by requiring group health policies to cover behavioral therapies as specified up to age 26, not 21. Sec. 14 requires public agencies, including municipalities, to follow specified protocol before disclosing an individual's personal information, as specified.

Committee(s) Reviewing Bill

Appropriations

Summary of OFA Municipal Fiscal Impact Statement (as relates to the mandate portion of the bill)

OFA reported no municipal impacts and referred only to the presence or absence of potential state impacts.

Appendix A: Mandate Legislation Listed by Committee of Cognizance

Emergency Certification

A procedure by which the speaker and president pro tempore jointly propose a bill and send it directly to the House or Senate floor for action with no committee referral or hearings

PA 25-1 (HB 8002)
(Nov. Spec. Sess.)

An Act Concerning Housing Growth

PA 25-3 (HB 8004)
(Nov. Spec. Sess.)

An Act Concerning Children's Behavioral Health, A Standard Self-Employment Expense Deduction for Temporary Family Assistance, The Telecommunications Surcharge to Support the Firefighters Cancer Relief Program, Courthouse Operations, Data Protection and Procedures for Redistricting and Correcting Districting Errors

Appendix B: Sec. 2-32c. *Submission to General Assembly of list of state mandates*

On and after July 1, 2019, the Connecticut Advisory Commission on Intergovernmental Relations, established pursuant to section 2-79a, shall, not more than ninety days after adjournment of any regular or special session of the General Assembly or November fifteenth immediately following adjournment of a regular session, whichever is later, submit to the speaker of the House of Representatives, the president pro tempore of the Senate, the majority leader of the House of Representatives, the majority leader of the Senate, the minority leader of the House of Representatives, the minority leader of the Senate and the chief elected official of each municipality a report that lists each state mandate enacted during said regular or special session of the General Assembly. Not later than five days after receipt of the report, the speaker and the president pro tempore shall refer each state mandate to the joint standing committee or select committee of the General Assembly having cognizance of the subject matter of the mandate.