



STATEMENTS OF FINANCIAL INTERESTS STANDARD & DESIGNATION GUIDELINES OFFICE OF STATE ETHICS

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STATE OF CONNECTICUT

GOVERNOR NED LAMONT

Dear Commissioners and Agency heads:

Public Service is a Public Trust.

Upholding this commitment is the paramount responsibility of each elected official and state employee in all branches of Connecticut State Government. We have the opportunity every day to provide important services to our state and fellow members of the public. Over the years Connecticut has been recognized as a national leader in transparency and accountability, and we are collectively working to increase public access to information and assistance through disclosure.

In 1977, Connecticut implemented an additional mechanism to ensure that specific state leaders do not have financial conflicts of interest between their private and public lives. Every year, approximately 2,500 elected officials and state employees file Statements of Financial Interests (“SFI”) with the Office of State Ethics. Required filers of these reports are either officials mandated by statute or by individuals who are designated by their agency head.

And that’s where you come in. These filings serve as an annual checkpoint for public officials as well as a tool to maximize public confidence in governmental decision making. The following overview will provide you with the Governor’s Standard and the guidelines for designating individuals to file Statements of Financial Interests.

If you have specific questions, contact the Office of State Ethics at (860) 263-2400 or at ose@ct.gov. Thank you for your cooperation and commitment to maintaining a high ethical standard through transparency in state government.

Sincerely,

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

Ned Lamont
Governor

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.

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 consists of three separate divisions - Legal, Enforcement, and the Administrative Division. Under the leadership of the Executive Director, Peter Lewandowski, who is appointed by the Citizen’s Ethics Advisory Board. The OSE Executive Director has overall responsibility for the welfare and effectiveness of the OSE.

Citizen’s Ethics Advisory Board (CEAB)

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.

CEAB Members also:

- Appoint and evaluate the Executive Director of the OSE
- Issue advisory opinions to persons subject to the Ethics Codes
- Serve as Hearing Officers for non-confidential hearings
- Attend hearings to determine if violations occurred and, if so, assess penalties
- Oversee the legislative agenda

Statements of Financial Interests (SFI)

Policy Summary

Enacted in 1977, the [Code of Ethics for Public Officials § 1-83 \(a\) \(1\)](#) requires elected officers, members of the General Assembly, and certain other state officials and employees to file electronically the annual SFIs with the Office of State Ethics. SFI filings include information such as names of all associated businesses, sources of income over \$1,000, and a list of all real property, as well as any creditors.

The SFIs serve two purposes. First, they provide a checklist or reminder to state officials and employees to be mindful of potential conflicts of interest or misuse of office for financial gain. Second, the SFIs, which are available to the public, serve as a tool to maximize transparency and public confidence in governmental decision making.

Governor's Standard

In addition to the requirements outlined in the Code of Ethics, Governor Lamont has adopted the standard which designates appointed officials and additional state employees in the Executive Branch who must file these financial disclosure statements and charges agency heads to determine who else among their staff and attached boards should also file. Specifically, requiring the "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

[Connecticut General Statutes Sec. 1-83.](#)

Statements of financial interests. Filing requirements.

(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 and such members of the Executive Department and such employees of quasi-public agencies as the Governor shall require, shall file electronically with the Office of State Ethics using the software created by the office, under penalty of false statement, a statement of financial interests for the preceding calendar year 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 electronically 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 electronically 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.
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 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.
10. 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.
11. Any employee in a designated position who occupied that 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.
12. 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.****

SFI Filing System

Duties of Designated Filers

Located online, the [SFI Filing System](#) is available to required and voluntary filers. Drafts are prepopulated with the previous year's entries, simplifying submission and preventing duplicate data entry. **Filings are due by 12:00 midnight on May 1 annually.** If, in any year, May 1 falls on a weekend or legal holiday, the filing will be due by 12:00 midnight the next business day. Filings can be completed any time after January 1, and may be amended if any information changes or you notice you made an error.

Agency Ethics Liaison's Role

Duties and Responsibilities [CGS 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.

Concerning Statements of Financial Interests, the designated ethics liaison provides internal assistance to designated SFI filers and is responsible for updating and maintaining the list of required filers in the [SFI Filing System](#) for his or her agency.

Current Employees

- Throughout the year, the agency ethics liaison must update the designation list of required filers as changes occur to the agency employment roles.
- By January 15, the agency ethics liaison should follow-up that each designee has been notified of their requirement to file.
- If an agency determines that an individual was erroneously designated, the liaison must notify the OSE by phone (860-263-2400) or by e-mail (sfi.ose@ct.gov) of any organizational changes that impacted the agency list of designated filers.

New Employees

- 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 or 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.
- 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.
- Each year, 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 entire *preceding year* by May 1.

Designated Employees Who Leave Their Position

- The ethics liaison must update the designation list within ten days if a designated 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.
- 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.
- 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.

Temporary Worker Retirees (TWR)

- **TWR employees are considered “state employees”** for purposes of the Code of Ethics for Public Officials and State Employees.
- TWR employees holding the office or position they occupied before they retired from state service ***do not need to file an additional SFI as a “departing official” until their TWR status expires.*** If a former employee retired from state service and already filed a departing official form upon their retirement, such employee will be required to file a departing official SFI form again upon the conclusion of their TWR status.
- If a state employee was not a designated SFI filer before retirement, but has now assumed a TWR status in an office or position subject to the SFI-filing requirement, such employee should be added to the SFI filer list. If they assumed the position on March 31 or earlier in the calendar year, they must file by May 1. If they assume the position after March 31, they have 30 days to file.
- Upon the conclusion of their TWR status, the TWR employee must be notified of their obligation to submit a departing official SFI form.

Agency Ethics Liaison List

[Current list of state agency/office Ethics Liaisons and Compliance Officers](#)

Contact Information



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

Telephone: 860-263-2400

Facsimile: 860-263-2402

Website: ct.gov/ethics

Business Hours: 8:30 am to 5:00 pm

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