

Existing Positions at Certain Regulatory Agencies Subject To Post-State Employment Prohibitions Revised November 2025

Introduction

The Code of Ethics for Public Officials generally prohibits public officials and state employees in certain regulatory agencies who hold positions with significant decision-making or supervisory responsibilities from accepting employment for one year after leaving state service with a business subject to regulation by their former agency. The prohibition is two years for certain employment in the gaming industry.

<u>Public Act 21–164</u> requires that by November 1, 2021, and at least annually from then on, the heads of certain executive branch regulatory agencies or their designees to electronically submit to the Office of State Ethics (OSE) designations of all existing positions that are subject to these restrictions. They must do so in a manner the Citizen's Ethics Advisory Board prescribes and must make these designations in consultation with the OSE.

The agency head or designee must submit any newly created positions that are subject to these provisions, but not included in the annual submission to OSE, within 30 days after the position's creation. OSE is required to maintain a list of all designated positions and post it on its website.

The designation requirement applies to the Office of Health Strategy's Health Systems Planning Unit; Connecticut Siting Council; Department of Banking; Insurance Department; Department of Emergency Services and Public Protection; Liquor Control Division within the Department of Consumer Protection; the Public Utilities Regulatory Authority, including the Office of Consumer Counsel; and the Department of Consumer Protection.

Designated Positions under **Section 1-84b (c)**

SECTION 1-84b (c) DESIGNATIONS

Connecticut General Statutes <u>Section 1-84b (c)</u> provides as follows:

- (c) The provisions of this subsection apply to present or former executive branch public officials or state employees of an agency who hold or formerly held positions which involve significant decision-making or supervisory responsibility. Such positions shall be designated as such by the agency concerned, in consultation with the Office of State Ethics, except that such provisions shall not apply to members or former members of the boards or commissions who serve ex officio, who are required by statute to represent the regulated industry or who are permitted by statute to have a past or present affiliation with the regulated industry. On or before November 1, 2021, and not less than annually thereafter, the head of each agency concerned, or his or her designee, shall submit the designation of all positions in existence on such date that are subject to the provisions of this subsection to the office electronically, in a manner prescribed by the Citizen's Ethics Advisory Board. If an agency creates such a position after its annual submission under this subsection, the head of such agency, or his or her designee, shall submit the designation of the newly created position not later than thirty days after the creation of such position. As used in this subsection, "agency" means the Health Systems Planning Unit of the Office of Health Strategy, the Connecticut Siting Council, the Department of Banking, the Insurance Department, the Department of Emergency Services and Public Protection, the office within the Department of Consumer Protection that carries out the duties and responsibilities of sections 30-2 to 30-68m, inclusive, the Public Utilities Regulatory Authority, including the Office of Consumer Counsel, and the Department of Consumer Protection and the term "employment" means professional services or other services rendered as an employee or as an independent contractor.
- (1) No public official or state employee in an executive branch position designated pursuant to the provisions of this subsection shall negotiate for, seek or accept employment with any business subject to regulation by his agency.

- (2) No former public official or state employee who held such a position in the executive branch shall, within one year after leaving an agency, accept employment with a business subject to regulation by that agency.
- (3) No business shall employ a present or former public official or state employee in violation of this subsection.

Designated Positions by Agency for **Section 1-84b (c)** (1 of 3)

Department of Banking

Banking Commissioner

Deputy Banking Commissioner

Director of Financial Institutions

Director of Securities & Business Investments Division

Director of Consumer Credit Division

Director of Government Relations and Consumer Affairs

General Counsel & Chief of Staff

Fiscal Administrative Manager 1

Senior Assistant Division Director for Financial Institutions

Insurance Department

Commissioner

Deputy Commissioner

Director of Property & Casualty Division

Director of Life & Health Division

Director of Legal Division

Director of Financial Analysis

Director of Financial Examination

Director of Market Conduct/Fraud Investigation & Licensing Division

Chief Insurance Actuary

Insurance Program Manager - Captive Insurance

The Health Systems Planning Unit of the Office of Health Strategy

Executive Director

Chief of Staff

Director of Legislation and Regulation

Agency Legal Director

Planning Specialist

Manager, Research and Planning

Designated Positions by Agency for **Section 1-84b (c)** (2 of 3)

Connecticut Siting Council

Members Appointed by the Governor (5)

Member Appointed by President Pro Tempore of the Senate

Member Appointed by Speaker of the House

Executive Director

Public Utilities Regulatory Authority

Chairperson

Vice-Chairperson

Commissioner

Office Director (Legal)

Public Utility Chief of Utility Regulation

Director of Legislation, Regulations and Communications

Public Utilities Director of Utility Regulation

Procurement Manager

Director of Adjudications

Chief of Staff (Chairperson)

Department of Consumer Protection

Commissioner

Deputy Commissioner

Legal Director

Liquor Control Division, Department of Consumer Protection

Chairman

Commissioners

CP Division Director for Liquor

Cannabis Control Division, Department of Consumer Protection

Cannabis Control Division Director

Designated Positions by Agency for **Section 1-84b (c)** (3 of 3)

Department of Emergency Services and Public Protection

Commissioner

Deputy Commissioner (Colonel) of the Division of State Police

Deputy Commissioner of the Division of Emergency Management and Homeland Security

Director of the Division of Statewide Emergency Telecommunications

Chief of Staff & Special Counsel

Counsel to the Commissioner

Agency Legal Director

Office of Consumer Counsel

Consumer Counsel

Agency Legal Director

Supervisor of Utility Financial Analysis

Director of Utility Oversight and Regulatory Reform

Designated Positions under Section 1-84b (d)

SECTION 1-84b (d) DESIGNATIONS

Connecticut General Statutes <u>Section 1–84b (d) – (e)</u> provides as follows:

- (d) The provisions of subsection (e) of this section apply to (1) present or former Department of Consumer Protection public officials or state employees who hold or formerly held positions which involve significant decision-making or supervisory responsibility and designated as such by the department, in consultation with the Office of State Ethics, and (2) present or former public officials or state employees of other agencies who hold or formerly held positions which involve significant decisionmaking or supervisory responsibility concerning the regulation or investigation of (A) any business entity (i) engaged in Indian gaming operations in the state, and (ii) in which a federally-recognized Indian tribe in the state owns a controlling interest, or (B) a governmental agency of a federally-recognized Indian tribe engaged in Indian gaming operations in the state, which positions are designated as such by the agency concerned, in consultation with the Office of State Ethics. On or before November 1, 2021, and not less than annually thereafter, the Commissioner of Consumer Protection and the head of each agency concerned, or their designees, shall submit designations of all positions in existence on such date that are subject to the provisions of this subsection to the office electronically, in a manner prescribed by the Citizen's Ethics Advisory Board. If the department or agency concerned creates such a position after its annual submission under this subsection, the Commissioner of Consumer Protection or the head of such agency, as applicable, or their designees, shall submit the designation of the newly created position not later than thirty days after the creation of such position.
- (e) (1) No Department of Consumer Protection public official or state employee or other public official or state employee described in subdivision (2) of subsection (d) of this section shall negotiate for, seek or accept employment with (A) a business entity (i) engaged in Indian gaming operations in the state, and (ii) in which a federally-recognized Indian tribe in the state owns a controlling interest, or (B) a

governmental agency of a federally-recognized Indian tribe engaged in Indian gaming operations in the state.

- (2) No former Department of Consumer Protection public official or state employee or other former public official or state employee described in subdivision (2) of subsection (d) of this section, who held such a position shall, within two years after leaving such agency, accept employment with (A) a business entity (i) engaged in Indian gaming operations in the state, and (ii) in which a federally-recognized Indian tribe in the state owns a controlling interest, or (B) a governmental agency of a federally-recognized Indian tribe engaged in Indian gaming operations in the state.
- (3) As used in this subsection, "employment" means professional services or other services rendered as an employee or as an independent contractor.

Designated Positions by Agency for Section 1-84b (d)

Department of Consumer Protection – Gaming

Legal Director

Legal Program Director overseeing gaming enforcement

CP Division Director – Gaming

Gaming Division Assistant Director (State Program Manager)

CP Gaming Regulation Supervisor (Foxwoods Casino)

CP Gaming Regulation Supervisor (Mohegan Sun Casino)

CP Gaming Regulation Supervisor supervising Tribal casino staff

Supervising Accounts Examiner (Casinos)

License and Applications Supervisor (Casinos)

Department of Emergency Services and Public Protection

Commissioner

Deputy Commissioner (Colonel) of the Division of State Police