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Important Note: Please remember, the Guide provides a general overview and is not a substitute for statutes and regulations or legal advice from the Office of State Ethics. You may find the relevant [statutes and regulations here](#), and formal [advisory opinions and declaratory rulings here](#).

About the Office of State Ethics (OSE)

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 Connecticut's 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 to provide prospective advice to the regulated community; investigating potential 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.

OSE's responsibilities include:

- **Education** – providing training and resources to public officials, state employees, and the public.
- **Advice** – issuing advisory opinions and informal guidance.
- **Enforcement** – investigating complaints and imposing penalties.
- **Transparency** – providing information to the public.

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	
Email:	ose@ct.gov ethics.code@ct.gov sfi.ose@ct.gov ethics.enforcement@ct.gov lobbyist.ose@ct.gov	General Inquiries Legal Advice on the Codes State Employee/Public Official Statement of Financial Interests Filing a Complaint/Past Action Lobbyist Filing/Reporting
Website:	www.ct.gov/ethics	
Business Hours:	8:00 am to 5:00 pm	

Top 5 Points

1. The **Code of Ethics for Public Officials** applies to all state public officials and state employees (except judges). ****Please note that *public officials who are legislators* should refer to the *Connecticut State Legislators Guide to the Code of Ethics*.****
2. Some provisions apply after you leave state service.
3. The Code's core purpose: **preventing state public positions from being used for personal financial gain (or that of family members and associated businesses).**
4. Agencies may have their **own ethics policies**, which can be stricter than the Code.
5. **"Always Ask Advice"** before acting if there are any concerns about conflicts of interests, gifts, outside employment, post-state employment, or any other Code-related issues.

THE CODE OF ETHICS FOR STATE PUBLIC OFFICIALS AND EMPLOYEES

Use of State Office

No public official or state employee shall use their position with the state of Connecticut for the financial benefit of:

- themselves personally,
- certain family members (*spouse, child, child's spouse, parent or sibling*), or
- an associated business**. [CGS 1-84 \(c\)](#)

****Definition:** An **associated business** is "any . . . entity through which business for profit or not for profit is conducted in which the public official or state employee or member of his or her immediate family is a director, officer, owner, limited or general partner, beneficiary of a trust or holder of stock constituting five per cent or more of the total outstanding stock of any class."

Note: There is an exception if the public official or state employee or member of his or her immediate family is an unpaid director or officer of a not-for-profit entity.

"Officer" refers only to the president, executive or senior vice president, or treasurer of such business. [CGS 1-79\(2\)](#)

Gifts

Definition: A **gift** is:

1. Anything of value,
2. Directly and personally received,
3. Without giving something of equal or greater value in return. [CGS 1-79 \(5\)](#)

In short, a benefit (*e.g., money, event tickets, meal, services*) received by a public official or state employee without them paying fair market value or otherwise providing something of equal or greater value in return for it.

Gifts may be offered by restricted and non-restricted donors:

1. **Restricted Donors** – Gifts are ***prohibited*** from restricted donors unless they fall under an applicable exception (see below). Restricted donors are:
 - Registered lobbyists (and their representatives).
 - Anyone doing business with your agency.
 - Anyone seeking to do business with your agency.
 - Anyone regulated by your agency.
 - Department of Administrative Services (DAS) prequalified vendors or contractors.
2. **Non-Restricted Donors**
 - **Gifts provided *because of your state position*:** Limited to **\$100/calendar year** plus anything that falls within an applicable gift exception.
 - **Gifts unrelated to your state position:** No limit (e.g., gifts that are strictly personal from long-time friends or family members).

Most Common “Gift” Exceptions

- **Token items** having a value of not more than \$20, up to \$100/year per source.
- **Food or beverage or both** costing less than \$100/year per source, if donor is present.
- **Gifts to the State** (items/services/conference expenses for official use, subject to reporting).
- **Informational materials.**
- **Vendor training** for a product purchased by your agency that is offered to all customers.
- Widely available **rebates, discounts or promotional items** (e.g., discount to ALL government employees).
- **Certificate, plaque or other ceremonial award** costing under \$250.
- **Major Life Events** – a gift not to exceed \$1,500 in recognition of:
 - Birth/adoption
 - Wedding
 - Funeral
 - Religious adulthood ceremony
 - Retirement from state service

Gift Reporting/10-Day Letter

Generally, if a restricted donor (as outlined above) provides you with anything valued in excess of \$20, it must provide you (and, if regulated by, doing business with, or seeking to do business with your department or agency, the executive head of your department or agency) with **a written description** within 10 days (i.e., a “10-day letter”) indicating the following:

- Name of the donor
- Description of item(s) given;
- Value of such item(s); and
- Total cumulative value of all items to date given to the recipient during the calendar year **CGS 1-84 (o)**

NOTE: If you receive a 10-day letter, you should store it in your files. If the letter contains erroneous information, you should contact the donor directly. Note that, for certain expenses/reimbursements for out-of-state travel or lodging for conferences/events (outlined in greater detail below), in addition to the donor providing a 10-day letter, you will have to file a report with the OSE (as discussed below).

Gifts Between State Officials/Employees

- **\$99.99 limit per gift** between supervisors and subordinates anywhere up or down the chain of command. (Unlimited if gifting between lateral employees.)
- Exception: a gift not to exceed \$1,500 for major life events (discussed above).
- Pooling money to exceed limits is prohibited.

Conferences/Events –

Actively Participating – If you are asked to *actively participate* (e.g., give a speech, sit on a panel, or run a workshop) at a conference or event in your official capacity as a public official or state employee, the *conference/event host may pay for certain necessary expenses* associated with the conference/event. **CGS 1-84 (k)**

Permissible:

- Coach travel

- Standard lodging (for the night before, of, and immediately following the event)
- Non-lavish meals
- Registration fees

Impermissible:

- Expenses for entertainment/sightseeing
- Expenses for family members/guests
- Fees/Honoraria (You may not receive payment for participating in the conference/event)

Passively Attending – if you are not *actively participating* in a conference/event, but are *simply attending* in your official capacity as a public official or state employee, provided that the conference/event is educational in nature and relevant to your state duties (as determined by your state agency), and this would be something your agency would pay for if it had the funds to do so, you may accept certain reasonable essential expenses as a **gift to the state**, specifically, coach-class travel, standard lodging, non-lavish meals integral to the event, and any conference registration fee. As with necessary expenses, you may not accept expenses for entertainment or sightseeing or expenses for family members or guests. [CGS 1-79 \(5\)\(E\)](#)

If you receive payment or reimbursement of necessary expenses or under the “gifts to the state” provision for lodging and/or out of state travel, you must **report such receipt within 30 days of the conference/event on the ETH-NE or ETH-GTS form on the [OSE website](#)**. Reporting is not required if payment or reimbursement of expenses is made by the State of Connecticut, the federal government or another state government

Conflicts of Interests

Substantial Conflicts

You are faced with a **substantial conflict and may not take official action** if you have reason to believe or expect that:

1. Your official action would directly (i.e., immediately) impact your financial interests (or those of your spouse, dependent child, or associated business), **and**
2. The effect is different from how it affects others in the same profession, occupation or group.

Required action: Recuse yourself from taking official action and provide written notification of the conflict to your superior (an email is sufficient) who must assign the matter to someone of equal or higher rank than you in the office (i.e., not your subordinate).

Potential Conflicts

You are faced with a **potential conflict** if:

- Your official action would affect your financial interests (or those of your spouse, parent, sibling, child, child's spouse, or associated business).

Not a conflict if:

- The impact is less than \$100, or
- It affects a "substantial segment of the general public" (i.e., all taxpayers, homeowners, etc.).

Required action:

If you are a "member of a state regulatory agency" ** (e.g., you sit on a regulatory board or commission): Either recuse yourself from the matter or prepare a statement, signed under penalty of false statement, describing the matter requiring action/nature of potential conflict and explaining why you are able to vote/participate fairly, objectively and in the public interest, despite the conflict (you must submit such statement to OSE and enter a copy into the public record).

If you are not a "member of a state regulatory agency" (e.g., you are an agency employee): Recuse yourself from taking official action and provide written notification of the conflict to your supervisor for reassignment to someone of equal or higher rank than you in

the office (i.e., not your subordinate). If you have no supervisor, submit the notification to OSE for advice.

Outside Employment (Moonlighting)

As a state employee or public official, you:

- May not accept work that impairs your independence of judgment as to your state position or requires or induces disclosure of confidential state information. [CGS 1-84 \(b\)](#)
- May not use your state position or confidential information derived therefrom for the financial gain of yourself, certain family members or an associated business. [CGS 1-84 \(c\)](#)
- May not use state time, materials, equipment, or personnel for your outside work. This includes doing any outside work on state time while teleworking for your state job. [CGS 1-84 \(c\)](#)
- May not be paid to appear before or work for entities who are paid to represent others before the following regulatory agencies: [CGS 1-84 \(d\)](#)
 - Department of Banking
 - Office of the Claims Commissioner
 - Health Systems Planning Unit at the Office of Health Strategy
 - Insurance Department
 - Department of Consumer Protection
 - Department of Motor Vehicles
 - State Insurance and Risk Management Board
 - Department of Energy and Environmental Protection
 - Public Utilities Regulatory Authority
 - Connecticut Siting Council
 - Connecticut Real Estate Commission

Hiring state employees for outside work:

Supervisors may not hire subordinates, and subordinates may not hire supervisors, for their outside business. This prohibition extends throughout the chain of command. [Advisory Opinion 2008-5](#)

Contracts

An agency head **may not contract** with his or her own agency. [CGS 1-84 \(i\)](#)

A public official or state employee, or an immediate family member or associated business of a public official or state employee, may enter a state contract valued at \$250 or more **only if** it has been awarded through an open and public process. [CGS 1-84 \(i\)](#)

Post-State Employment (Revolving Door)

Lifetime bans:

- **Confidential information** [CGS 1-79 \(2i\)](#): Once you leave state service, you may never disclose confidential information gained in state service for financial gain for yourself or another person. [CGS 1-84a](#)
- **Side-switching**: Once you leave state service, you may never represent anyone (other than the state) in a matter (1) you were personally or substantially involved in while in state service, (2) in which the state has a substantial interest. [CGS 1-84b \(a\)](#)

One-year bans:

- **Cooling-off period**: You may not represent anyone for compensation before your former agency for one year after you leave state service. ("Represent" is defined broadly and includes, for example, appearing in person or via videoconference, signing a document, or identifying yourself on the telephone.) [CGS 1-84b \(b\)](#)
- **Prohibited employers**: You may not accept employment for one year after you leave state service with a party to a state contract ($\geq$ \$50,000) if (1) you substantially participated in, or supervised, the negotiation or award of that contract; and (2) it was signed within your last year of state service. [CGS 1-84b \(f\)](#)
- **Designated positions**: Those in (or who have left) certain designated positions (involving significant decision-making or supervisory responsibility) at certain regulatory agencies may not negotiate for, seek or accept employment with any

business subject to regulation by his agency while still in state service or accept such employment for one year after leaving. Please see the publication titled *Existing Positions at Certain Regulatory Agencies Subject To Post-State Employment Prohibitions* available on our [website](#). **CGS 1-84b (c)**

NOTE: Special gaming restrictions: Certain employees at Consumer Protection and Emergency Services/Public Protection face additional bans. **CGS 1-84b (d) and (e)**

DISCLOSURE

Statements of Financial Interests (SFI)

The SFI is a tool to effectuate transparency and accountability concerning those leading Connecticut's state government.

Who Must File

- State elected officials, including statewide officers and legislators.
- Certain statutorily designated executive branch and quasi-public agency officials. **CGS 1-83 (a)(1)**
- Members of the executive branch and employees of quasi-public agencies identified by their agencies as having met the **Governor's Standard**, generally including those with significant policymaking, contracting, or supervisory authority.

What to Disclose (for you, your spouse, and dependent children who reside in your house)

- Businesses with which you are associated.
- Income sources over \$1,000 (source, not amount).
- Securities over \$5,000 (source, not amount).
- Real estate holdings.
- Blind trusts.
- State/Quasi-Public contracts or leases.
- Debts over \$10,000 (confidential section). **CGS 1-83 (b)**

SFI Deadlines

- May 1 annually.
- Within 30 days of assuming a position that requires filing an SFI (if assuming such position after March 31).
- Within 60 days of leaving the SFI designated position (covering the portion of the final year).

ETHICS COMPLIANCE

Ethics Compliance Officers

- Required in agencies handling or planning large contracts.
- Develop agency ethics policy.
- Train employees on ethics, including contracting rules.

Ethics Liaisons

- Required in every other state agency and quasi-public agency.
- Serve as the link between agency and OSE.
- Coordinate training and internal agency policies.

OSE supports officers and liaisons with training, newsletters, FAQs, and resources online.

Mandatory Reporters

Certain officials **are required to report suspected violations** if they have reasonable cause to believe a person has violated the Code:

- Commissioners and Deputy Commissioners.
- Agency and quasi-public agency heads/deputies.
- Officials in charge of procurement, contracting, or human resources. [CGS 1-101pp](#)

ETHICS ENFORCEMENT

Complaint Process

1. A complaint is filed by the Ethics Enforcement Officer or any person (including a state employee, public official, or member of the general public).
2. Confidential investigation and probable cause hearing held before a judge trial referee assigned by the Chief Court Administrator.
3. If probable cause is found, a public hearing will be held by the CEAB to determine whether a violation occurred.

Penalties May Include:

- Orders to comply with the Code or file required reports.
- Civil penalties (up to \$10,000 per violation, or \$10/day for late filings).
- Referral to the Chief State's Attorney for criminal prosecution (intentional violations are misdemeanors; if gain $\geq$ \$1,000, it's a felony).
- Attorney General may seek up to 3x the economic gain from a violation.

Note: Please review the "Citizen's Guide to Filing a Complaint" (available online) for a full overview of the complaint process.