
NOTICE OF CONNECTICUT STATE AGENCIES

DEPARTMENT OF HOUSING**Notice of Issuance of a Certificate of Affordable
Housing Project Completion in
the Town of New Canaan**

In accordance with C.G.S. 8-30g, the Department of Housing (DOH) has issued a Certificate of Affordable Housing Project Completion. This certificate entitles the Town of New Canaan to a Moratorium of Applicability with regard to said statute. The effective date of this moratorium is on the date of publication in the Connecticut Law Journal (August 27, 2024), and will remain in effect, unless revoked in accordance with the statute for a four-year period. For additional information, please call or write to Michael C. Santoro, Community Development Specialist, DOH, 505 Hudson Street, Hartford, CT 06106, (860) 270-8171.

**CONNECTICUT MUNICIPAL REDEVELOPMENT
AUTHORITY**

Notice of Intent to Adopt Operating Procedures

In accordance with Conn. Gen. Stat. §1-121, the Connecticut Municipal Redevelopment Authority hereby gives notice that it intends to adopt Operating Procedures.

Statement of the substance and purpose of the proposed amendments: The Municipal Redevelopment Authority intends to adopt Operating Procedures that will govern its budgeting, personnel, procurement and other administrative functions.

The complete text of the policy is included below.

PROPOSED OPERATING PROCEDURES

I. GENERAL PURPOSE

The general purposes of the Connecticut Municipal Redevelopment Authority are described in Sections 8-169hh to 8-169ss, inclusive, (Chapter 130) of the Connecticut General Statutes as amended from time to time (the “Act”).

II. GOVERNANCE

Connecticut Municipal Redevelopment Authority, a quasi-public agency of the State of Connecticut (“MRDA”), shall be governed by a Board of Directors (the “Board”) comprised of a number, and appointed in a manner, as prescribed in the Act. The affairs of the Board shall be conducted in accordance with applicable law, MRDA’s By-Laws and such policies with respect to corporate governance as are adopted by the Board from time to time.

III. ADMINISTRATION

The Governor shall appoint a Chairperson of the Board and the Board shall elect a Vice-Chairperson of the Board and any other officers as provided in the By-Laws. The Board shall elect an Executive Committee of not less than five members of the Board and its powers shall be those delegated to it by the full Board. The Chairperson of the Board, with the approval of the Board, shall appoint an Executive Director in accordance with the Act, who shall have the duties and responsibilities set forth therein and in

the Bylaws. References in these Operating Procedures to approval by the Board shall mean and include approval by the Board or by any duly constituted committee thereof authorized to act on behalf of the Board pursuant to the By-Laws of MRDA.

IV. ADOPTION OF ANNUAL OPERATING BUDGET AND PLAN OF OPERATION

Prior to the close of the then current fiscal year, the Executive Director shall cause to be prepared a suggested Annual Operating Budget for the forthcoming fiscal year, which shall also comprise the Annual Plan of Operation. The suggested Annual Operating Budget for the forthcoming fiscal year shall be considered by the Board prior to the close of the then current fiscal year, modified if deemed necessary, and adopted to be effective beginning the first day of the forthcoming fiscal year. The Annual Operating Budget may be modified by the Board from time to time during the fiscal year to which it relates. At the end of the second and third quarters of the fiscal year, and more frequently, if appropriate, the Board shall modify the annual Operating Budget if any line item contains or is projected to contain a deficit. The use of surplus funds in the annual Operating Budget or for any other purpose must be approved by the Board. Board approval shall be required for any non-budgeted expense in excess of \$5,000.

V. PERSONNEL PROCEDURES

All employees shall be exempt from the classified service and shall have all rights and benefits provided by applicable law.

A. HIRING AND PROMOTIONS

At least annually, the Board shall establish and approve a schedule of positions and total staffing levels for MRDA. The schedule of positions shall describe the signature authority, if any, of each position. The Executive Director may from time to time approve any new classification below the "Director" level and fill any position on such schedule of positions and within such total staffing levels, except as may otherwise be provided in any applicable resolution of the Board. The creation of any new Director-level position or above shall require the separate approval of the Board. New positions approved by the Board and existing positions that become available shall be posted by the Executive Director in a publicly advertised manner reasonably designed to reach a range of possible applicants.

Notwithstanding any other provision of this section or any employee handbook or other personnel policies of MRDA, any appointment to the position of Executive Director, the manner of the conduct of any search for qualified applicants for such position, and terms and conditions of employment in such position, including matters of compensation and benefits, shall be in the discretion and subject to the approval of the Board.

B. COMPENSATION AND BENEFITS

The Board shall establish and may from time to time modify reasonable compensation plans and employee benefits programs as the Board determines to be necessary or appropriate to attract and retain qualified employees and carry out MRDA's statutory mission including:

1. a compensation plan, which shall consist of sufficient salary grades to provide such compensation rates as may be determined to be necessary or desirable for all job classifications within MRDA, and which may include an incentive compensation program for any job classification;
2. an employee benefits program, which may include vacation days, holidays, sick days, group health, life and disability insurance, tuition reimbursement, professional membership dues, length of service awards and other benefits, including eligibility criteria and benefit levels;
3. a performance evaluation system, which may be used to determine merit increases in salary and incentive compensation levels;
4. policies with respect to business travel and meal reimbursement; and
5. other reasonable compensation and employee benefits programs and policies as the Board determines to be necessary and appropriate to attract and retain qualified employees to fill positions or vacancies authorized by the Board.

The Executive Director has the authority to establish and modify certain employee policies involving workplace flexibility that do not in the aggregate have an adverse financial impact on MRDA.

The Executive Director shall be empowered to administer MRDA's compensation plan and employee benefit programs and policies as approved by the Board, and shall have the authority to approve performance evaluations, determine merit increases and incentive compensation payments and carry out such other duties and responsibility as appropriate within the overall salary and employee benefits administration plan, except that performance evaluations, and determination of employee benefits, merit or other salary increases and bonus payments for the position of Executive Director shall be determined by the Board or a committee of the Board having been delegated such responsibility. The Board shall review MRDA's compensation plan and benefit programs as part of its annual review of its budget and plan of operations.

C. REPRIMAND, SUSPENSION, DEMOTION, AND DISMISSAL

The Executive Director may reprimand, suspend, demote or dismiss any employee of MRDA when they consider the good of MRDA to be served thereby. Such employee shall be given written notice of such action at least two weeks in advance of the effective date of such action. Such notice shall set forth the reason for such action in sufficient detail to indicate whether the action was for misconduct, incompetency or other reason(s) relating to the effective performance of their duties. Said advance notice may, however, be waived in cases of serious misconduct.

Such employee shall have the right to appeal such action to the Board, in addition to such other rights of appeal as may be available under law.

D. EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION

It is the policy of MRDA to provide equal employment opportunities to all applicants and employees regardless of race, color, religious creed, sex, sexual orientation, gender identify or expression, marital status, age, national origin, ancestry, mental disability, intellectual disability, learning disability, physical disability, veteran status or any other characteristic protected by federal, state, or local law. It is also the policy of MRDA to take affirmative action to employ and to advance in employment all persons regardless of race, color, religious creed, sex, sexual orientation, gender identify or expression, marital status, age,

national origin, ancestry, mental disability, intellectual disability, learning disability, physical disability, veteran status or any other characteristic protected by federal, state, or local law and to base all employment decisions only on valid job requirements. This policy shall apply to all employment action, including but not limited to, recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation and selection for training at all levels of employment.

Employees and applicants of MRDA will not be subject to harassment on the basis of race, color, religious creed, sex, sexual orientation, gender identify or expression, marital status, age, national origin, ancestry, mental disability, intellectual disability, learning disability, physical disability, veteran status or any other characteristic protected by federal, state, or local law. Additionally, retaliation, including intimidation, threats, or coercion, because an employee or applicant has objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any federal, state, or local Equal Employment Opportunity law is prohibited.

VI. PROCUREMENT AND PURCHASING PROCEDURES

MRDA's procurement philosophy is that all purchases, should, wherever possible, result from a competitive process whereby qualified vendors vie to obtain MRDA's business by offering the most favorable terms, including a fair price, for the timely delivery of high quality goods and services. In those instances for which a competitive process is not possible, efforts should be made to achieve these same procurement outcomes regarding favorable terms, price, timeliness and quality.

Since no set of procedures can identify every situation and exception, all parties involved in the negotiation, performance, or administration of purchases are required to act in good faith to advance the competitive principles that underlie it. Accordingly, no individual purchase should be made deliberately to evade this Policy, including through the issuance of separate contracts, purchase orders or other methods to avoid the limits and thresholds contained in this Policy. In addition, all purchases are to be made in compliance with applicable ethics laws and conflict of interest policies of the State and MRDA.

A. ACQUISITION AND CONVEYANCE OF INTEREST IN REAL PROPERTY

MRDA, acting through the Executive Director or another duly authorized officer, shall, pursuant to the Act, have the power to acquire by gift, purchase, lease or transfer, lands or rights-in-land and to sell and lease or sublease, as lessor or lessee or sublessor or sublessee, any portion of its real property rights, including air space above, and enter into related common area maintenance, easement, access, support, and similar agreements, and own and operate facilities associated with MRDA development projects, provided such activity is consistent with all applicable federal tax covenants of MRDA; and transfer or dispose of any property or interest therein acquired by MRDA at any time. Prior to any acquisition, transfer, or disposal, MRDA shall:

1. provide opportunity for public comment,
2. act in accordance with the provisions of Chapter 10 of the C.G.S, and
3. approve, on-a case-by-case basis, the procedure to be utilized in a procurement or transaction related to real property that it determines is in the best interest of MRDA in furtherance of its statutory purposes. In making its determination, the Board shall indicate what appraisals, if any, shall be required as part of the procurement process. Board approval shall be required for any real estate procurement or transaction that exceeds \$50,000.

B. PURCHASE OF PERSONAL SERVICES, PERSONAL PROPERTY AND OTHER GOODS AND SERVICES

MRDA, acting through the Executive Director or another duly authorized officer, shall, subject to the requirements of State law and these procedures, have the authority to: (A) acquire, lease, purchase, own, manage, hold and dispose of personal property, and to lease, convey or deal in or enter into agreements with respect to such personal property, (B) contract for financial, legal, bond underwriting and other professional services, (C) engage architects, engineers, attorneys, accountants, consultants and such other independent professionals as may be necessary or desirable to carry out MRDA projects, (D) contract for construction, development, concessions and the procurement of goods and services, (E), engage in and contract for marketing and promotional activities for MRDA projects, and (F) purchase other goods, services and commodities and to make such purchases on

terms necessary or incidental to carrying out of the purposes of MRDA pursuant to the Act.

1. **EXCEPTIONS** – These procedures are not intended to cover the purchase of items such as utilities (including, but not limited to, electricity, gas and sewer); the routine delivery of documents (for example, by the United States Postal Service, or by a recognized overnight delivery service provider); subscriptions and reference materials; sponsorships; professional, industry, business dues and continuing education, and similar items.
2. **PROCUREMENT PROCEDURES** – Transactions related to personal property and the purchase of professional services and other goods and services, with the exception of those exempted in Section VI.b.1., shall occur in accordance with the following procedures:
 - a. For goods or services having a net financial impact to MRDA of greater than \$5,000 but equal to or less than \$20,000, verbal quotes from at least three vendors shall be sought. If obtaining at least three quotes is not possible, MRDA shall obtain such quotes as it is able.
 - b. For goods or services greater than \$20,000 but equal to or less than \$50,001, written quotes from at least three vendors shall be sought. If obtaining at least three quotes is not possible, MRDA shall obtain such quotes as it is able.
 - c. For goods or services greater than \$50,001, such purchases shall be by a Public Solicitation, except as otherwise allowed in this policy. Public Solicitation means the process of publicly issuing an invitation to bid, request for proposals, or similar document, as appropriate to the purchase being made, that invites qualified vendors to submit proposals and prices for the goods or services to be purchased. For consulting services greater than \$50,000, MRDA may utilize an RFQ Public Solicitation whereby firms submit their qualifications and pay rates and, from that process, MRDA may create a short-list of on-call

consultants. MRDA may then contract for services greater than \$50,001 with consultants by soliciting written quotes from at least two consultants pre-qualified for on-call services through Public Solicitation. If the number of pre-qualified consultants allows, three written quotes should be obtained. Such on-call pre-qualifications shall be in effect for no longer than three year.

3. WAIVERS – The Executive Director, or such another duly authorized officer, shall have the authority to waive the requirements that MRDA obtain quotes or issue a Public Solicitation provided that the Executive Director or duly authorized officer determines, based on written documentation, that one of the following circumstances justifies such a waiver:
 - a. Purchases involving unusual conditions or contingencies. For this purpose, an “unusual condition or contingency” exists (a) when there are unusual conditions or contingencies that could not reasonably be foreseen or (b) because of unusual or non-competitive trade or market conditions.
 - b. Purchases in emergency situations. For this purpose, an “emergency” exists when there is an immediate threat to public health, welfare or safety, or to a critical MRDA service or function that will adversely affect MRDA’s essential governmental operations if not addressed immediately. The Executive Director shall document, in writing, the nature of the emergency and the need for the emergency purchase and provide such written document to the Board.
 - c. Purchases that, due to the nature of the agreement to be contracted for or procured, the Executive Director or another duly authorized officer determines that open and competitive bidding is either impractical or not in MRDA’s best interest.

A list of waivers of the requirements to obtain quotes or issue a Public Solicitation for purchases anticipated to exceed \$25,000, and the reasons for such waiver, shall be provided to the Board as part of their monthly meetings.

4. OTHER ALLOWABLE PROCUREMENT METHODS – The following purchasing methods may, after analyzing the options, be utilized by MRDA in lieu of seeking quotes or issuing a Public Solicitation of its own:
 - a. Purchases from vendors awarded a contract by the State of Connecticut Department of Administrative Services that warrant to the State that the prices, terms and conditions of that contract will be extended to all political subdivisions of the State.
 - b. Purchases from or through any federal, state or municipal governmental surplus property program, including the Connecticut State Surplus Property Program.
 - c. Purchases by, from, in conjunction with, or on behalf of other Connecticut quasi-public agencies, state agencies or political subdivisions of the State of Connecticut, any other state, the federal government, or inter-governmental purchasing groups or cooperatives.
 - d. In any case where MRDA is receiving or providing financial assistance in conjunction with another state agency or quasi-public authority, nothing in this section shall prohibit MRDA from utilizing accountants, attorneys, appraisers, financial advisers, investment advisers, underwriters, investment managers, investment bankers, brokers, architects, construction managers, engineers and other consultants and professionals approved or provided by such state agency or quasi-public authority as a part of its normal contracting process, provided such use does not create any conflict of interest.

5. CONTRACT BOARD APPROVAL – Board approval shall be required for any agreement or contract related to purchases that are anticipated to exceed \$50,000, along with amendments adding funding to any contracts over \$50,000. Requests for such amendments shall include a written justification from the Executive Director for not conducting a public solicitation related to the additional funding.

6. **CONTRACTING WITH INDIVIDUALS** – Internal Revenue Service (IRS) guidelines shall be consulted prior to contracting with an individual to determine if the duties and activities involved are those of an independent contractor or an employee. The website of the State Comptroller’s Office has additional information in this regard.
7. **LIMITATION OF TERM** – MRDA shall solicit proposals at least once every three years for financial, legal, bond, underwriting and other professional services required by MRDA on a regular and ongoing basis. MRDA shall not contract with the same person, firm or certified public account to conduct financial audits of its finances for more than six consecutive fiscal years.
8. **STATE CONTRACTING REQUIREMENTS** – Any solicitation of bids or proposals by MRDA, and any award of a contract by MRDA, shall be subject to all state procurement and contracting requirements applicable to quasi-public agencies of the state, including without limitation the following to the extent applicable in the circumstances:
 - a. Section 9-612(g) of the General Statutes, as amended, relating to campaign contributions by state contractors and their principals and related notices to state contractors and pro-spective state contractors;
 - b. Section 4-252 of the General Statutes relating to affidavits as to gifts from contractors under certain large state contracts;
 - c. Section 4a-81 of the General Statutes relating to affidavits with respect to consulting fees;
 - d. Section 3-13l of the General Statutes relating to the prohibition of finder's fees in connection with investment transactions;
 - e. Section 3-13j of the General Statutes relating to the disclosure of third party fees attributable to investment services contracts;
 - f. Section 4-61dd of the General Statutes relating to whistleblower protections; and
 - g. Section 4a-60 and 4a-60a of the General Statutes

relating to non-discrimination in state contracting and documentation of contractor adoption of a corporate policy supporting the non-discrimination agreements and warranties required by Sections 4a-60 and 40a-60a.

9. RECORD RETENTION – All documents related to the solicitation process (quotes or full solicitation), selection, negotiation, contracting, contract management and contract closeout for any purchase shall be retained in a single file (electronic and/or physical) by MRDA. Such file shall be created and retained in accordance with any applicable records retention laws and policies. Such records shall be retained for a minimum of three years following the completion of the term of any agreement or contract resulting from any procurement process or in accordance with any applicable laws or regulations, including those related to audits, whichever is longer.

VII. ISSUING AND RETIRING BONDS, BOND ANTICIPATION NOTES AND OTHER OBLIGATIONS

The Board shall approve the issuance and retirement of all bonds, bond anticipation notes and other obligations of MRDA. The issuance of any bonds, bond anticipation notes or other obligations of MRDA pursuant to the authority granted in the Connecticut General Statutes, or which are guaranteed by the State of Connecticut or for which there is a capital reserve fund of any kind which is in any way satisfied to or guaranteed by the State of Connecticut, shall be subject to the approval of the Treasurer or the Deputy Treasurer in the manner provided in the Connecticut General Statutes.

VIII. SURPLUS FUNDS

Surplus funds, to the extent not limited or assigned or restrained by law, statutes or regulations, agreements, bond resolutions, or trust indentures, can be used for any lawful purposes of MRDA subject to its policies and procedures as to the budgeting and expenditure of MRDA funds. Any such funds not needed for immediate use or disbursement may be invested in obligations issued or guaranteed by the United States or the state, including the Short Term Investment Fund and the Tax-Exempt Proceeds Fund, and in other obligations that are legal investments for savings banks in the state, and in-time deposits or certificates of deposit or other similar banking arrangements secured in such manner as MRDA determines.

IX. WAIVER OF FEES UNDER THE FREEDOM OF INFORMATION ACT

MRDA shall waive fees relating to a request for records for individuals meeting the requirements of General Statutes Section 1-212(d) of the Connecticut Freedom of Information Act (“FOIA”). For purposes of determining whether an individual meets the indigency requirement, MRDA shall apply the provisions of Section 52-259b of the Connecticut General Statutes, as amended, which governs fee waivers in Connecticut’s courts, as modified herein, to provide bright-line rules for ease of administration. A person will be deemed to be indigent for purposes of a fee waiver under the FOIA if:

- A. such person receive public assistance (i.e. state-administered general assistance; temporary family assistance; aid to the aged, blind, and disabled; food stamps; or Supplemental Security Income), or
- B. such person’s household income after taxes and mandatory wage deductions is one hundred twenty-five percent or less of the federal poverty guidelines published in the Federal Register each year by the United States Department of Health and Human Services, or
- C. such person’s monthly household expenses for housing, utilities, food, clothing, insurance, transportation, child care, and other legal obligations exceeds such person’s monthly household income, and such person’s available household assets are less than one thousand dollars.

A person requesting a fee waiver will be required to submit a fee waiver application and financial affidavit obtained from MRDA who shall grant a fee waiver upon receipt of a sworn affidavit that demonstrates indigency under the standards set forth herein.

X. AMENDMENT OF PROCEDURES

These Operating Procedures may be amended in accordance with Section 1-121of the Connecticut General Statutes, as amended.

Manner of presenting views: All interested persons are invited to present their views in writing no later than **September 27, 2024**. Comments are to be submitted to the Connecticut Municipal Redevelopment Authority either by e-mail to ctmuniredevelopmentauthority@gmail.com (please put “Public

Comment re: Operating Procedures” in the subject line) or by postal mail addressed to them at:

ATTN: CT MRDA
CT Department of Economic and Community Development
450 Columbus Boulevard
Hartford, CT, 06103

**CONNECTICUT MUNICIPAL REDEVELOPMENT
AUTHORITY**

Notice of Intent to Adopt an Ethics Policy

In accordance with Conn. Gen. Stat. §1-121, the Connecticut Municipal Redevelopment Authority hereby gives notice that it intends to adopt an Ethics Policy.

Statement of the substance and purpose of the proposed amendments: The Municipal Redevelopment Authority intends to adopt an Ethics Policy to ensure staff and Board Members do not have conflicts of interest and act in accordance with Chapter 10 of the CT General Statutes.

The text of the policy is included below.

PROPOSED ETHICS POLICY

The Connecticut Municipal Redevelopment Authority (MRDA) is committed to the highest ethical standards by its Board of Directors, managers and employees (members). This Ethics Policy is intended to establish and maintain high standards of honesty and integrity for all members of MRDA. Individuals in public service occupy roles and positions of trust and responsibility that require them to adhere to the highest ethical standards. Ethical conduct and the avoidance of even the appearance of impropriety are extremely important in the relationships that members of MRDA have with the public, other governmental organizations and representatives, and tenants, lessees and contractors, whether they be current or potential.

This policy is intended to provide guidance to MRDA members in determining what conduct is prohibited so that it may be avoided. It is intended to supplement the Connecticut Code of Ethics for Public Officials (Code) and other applicable provisions of the Connecticut General Statutes. A very useful resource for members of MRDA with regard to the Code is the guide prepared and updated annually by the Office of State Ethics (OSE). It may be found on the Internet at:

http://www.ct.gov/ethics/lib/ethics/guides/2012/public_officials_and_state_employees_guide_december_20_12_rev.pdf

The provisions of this policy represent the minimum expectations for compliance by members of MRDA. Since it is impossible to

articulate in a policy such as this each and every type of issue that may arise for MRDA members, they are encouraged to raise questions with the Executive Director, MRDA's Ethics Liaison, their supervisor or manager, or the OSE.

It is expected that all members of MRDA will comply with the provisions contained within this policy and the Code. Violations of these provisions may subject a member to administrative and/or disciplinary sanctions.

A copy of this policy will be provided to each member of MRDA and will be included among the materials provided to all new members of MRDA. Finally, MRDA will make this policy available to all vendors, lessees, tenants, contractors and other business entities doing business with MRDA.

I. Gifts and/or Payments

No member of MRDA, or member of their immediate family, (spouse, child, child's spouse, parent, sibling) shall either individually or as a member of a group, directly or indirectly, accept or solicit any gift, discount or gratuity from any restricted donor as defined by the Code, including any registered lobbyist or lobbyist's representative; any person or organization that currently has or is seeking or expected to have a business relationship with MRDA or anyone acting on behalf of such a person or organization; or, contractors pre-qualified by the Connecticut Department of Administrative Services. A gift is anything of value that an MRDA member or member of their immediate family directly and personally receives for which they have not paid fair market value and which is not generally available to the public or through contractual agreements with MRDA or other governmental entities. Included among these items are meal payments; golfing fees; costs or fees for social events; travel or airline ticket discounts; bottles of liquor; and concerts and sporting event tickets. This list should not be considered to be all-inclusive.

There are certain exceptions to the definition of a gift that are recognized by MRDA:

- A. Token items such as pencils, ballpoint pens and similar items used as promotional giveaways provided the fair market value of an individual item is not more than ten dollars and that the aggregate value of all things given from a single source in any calendar year does not exceed fifty dollars.

- B. Admission to a charitable or civic event, including food and beverage provided at the event, but excluding lodging or travel expenses, at which the member participates in their official capacity, if the amenities are provided by the primary sponsoring agency.
- C. Goods and services that are provided to MRDA for use on MRDA property or that support an event, and which facilitate MRDA action or functions.
- D. A certificate, plaque or other ceremonial award provided the cost does not exceed one hundred dollars.
- E. A rebate, discount or promotional item available to the general public.
- F. A gift received from (a) an individual's spouse, fiancé or fiancée; (b) the parent, brother or sister of such spouse or such individual; (c) the child of such individual or the spouse of such child.
- G. A political contribution otherwise reported by law or a donation or payment as described by subdivision (9) or (10) of subsection (b) of section 90-601a.
- H. Anything of value provided by an employer of (a) a public official, (b) state employee, or (c) a spouse of a public official or state employee, to such official, employee or spouse, provided such benefits are customarily provided to others in similar circumstances.
- I. Training that is provided by a vendor for a product purchased by MRDA or another state agency on behalf of MRDA which is offered to all customers of such vendor.

Different rules apply to gifts that are offered or solicited from persons or organizations outside MRDA than to gifts offered or accepted among members of MRDA. With respect to gifts between/among MRDA members, no MRDA member or member of his/her immediate family may give to or receive from a subordinate a gift costing one hundred dollars or more. Similarly, a subordinate may not give or receive such a gift from his/her supervisor. This prohibition extends to all persons in one's chain of command, not just an immediate supervisor or subordinate. There is an exception for a "major life event" as defined in the Code. These events include the birth or adoption of a child; a wedding; a funeral; a ceremony commemorating induction into religious adulthood; and one's retirement from state or MRDA service. In these cases, the value of the gift may not exceed one thousand dollars. It is not permissible for employees to pool their funds to purchase a gift costing more than one hundred

dollars or more for a supervisor or subordinate, or over one thousand dollars if the gift is for a major life event.

A MRDA member may receive from a sponsor or vendor organization payment or reimbursement for necessary expenses only if they, in their official capacity, actively participates in an event (i.e. giving a speech or presentation, running a workshop, etc.).

Necessary expenses are limited to:

- A. Travel (coach or economy class)
- B. Lodging (standard cost of room for the nights before, of, and immediately following the event)
- C. Meals
- D. Related conference/event expenses

Entertainment costs (i.e. tickets to sporting events, golf outings, night clubs, etc.) are not necessary expenses. Necessary expense payments also do not include payment of expenses for family members or other guests. An MRDA member may not receive a fee or honorarium for a speech or presentation given in his/her official capacity. Within thirty days of receiving payment or reimbursement from sponsoring/vendor organization for necessary expenses for lodging or out-of-state travel, as a member of the MRDA you must file an ETH-NE form with the OSE. This form is available on the OSE's website:

<http://www.ct.gov/ethics/cwp/view.asp?a=3508&q=414910>

This form is not required if your necessary expenses were paid by the federal government or by another state government.

MRDA members may also be provided with vendor sponsored training for a product purchased by MRDA or another state agency on its behalf provided such training is offered to all customers of that vendor. An MRDA member may be permitted to visit the site of a vendor at the vendor's expense, whether in Connecticut or out of state, for educational purposes or specific technical training. However, its purpose must be reflected as a term of the vendor contract. Members in these situations must still receive prior written travel authorization from the Executive Director or, in the Executive Director's case, the Chairperson of the Board. This action

is necessary even though there is no cost to MRDA. All other official visits to vendor facilities by MRDA members must be at MRDA's expense.

II. Outside Employment, Business Interests, Conflicts of Interest and Confidentiality

No MRDA member shall allow personal business or obligations to take precedence over his/her responsibilities to MRDA. This prohibition is not intended to preclude an employee from responding to emergency situations. However, such situations should be the exception, rather than the norm. Supervisors and managers are expected to exercise reasonable discretion in enforcing these provisions. Unless otherwise specified, an MRDA member is not prohibited from engaging in outside employment so long as there is no actual or apparent conflict of interest.

MRDA members must, however, avoid any outside employment or other activity that interferes with their normal work time, or that affects the satisfactory performance of their MRDA duties. Any outside employment or other activity that might discredit or reflect unfavorably on the member or MRDA must be avoided. Members are prohibited from performing work for any business that is in a contractual relationship with MRDA. MRDA members must not engage in any outside employment, business or other activity that gives rise to a real or apparent conflict of interest (an apparent conflict of interest arises whenever actions of a member create the appearance to an objective and informed person, knowing all the relevant facts, that the member is violating a provision of law or this policy).

MRDA members are prohibited from obtaining outside employment that will impair their independence of judgment or require or induce disclosure of confidential information gained in the employment or appointment with MRDA. The question of what constitutes impairment will be determined by the OSE. An MRDA supervisor, manager or director may not employ an MRDA employee-subordinate in his/her outside business. So too, it is impermissible for an MRDA employee-subordinate to employ an MRDA supervisor, manager or director in the subordinate's business. Both situations would impair independence of judgment. This prohibition extends to all supervisors, managers, directors and subordinates up and down the chain of command.

No MRDA member shall seek or accept employment with, or compensation from any consultant, contractor, lessee or any other organization or individual under contract or agreement with MRDA, nor can any MRDA member or member of their immediate family, or business with which they are associated, enter into a personal services contract or other contract with MRDA or the State of Connecticut, other than a contract of employment as an MRDA employee or with a state agency, valued at one hundred dollars or more unless the contract has been awarded through an open and public process.

An MRDA member is prohibited from using their position with MRDA for financial gain for such member, their spouse, child, child's spouse parent, brother, sister or business with which they are associated. Additionally, no MRDA member shall have, directly or indirectly, a financial interest in any business, firm or enterprise doing business with MRDA that could cause a conflict of interest or influence the performance of the member's duties and responsibilities. The financial interest referred to in this provision is not intended to apply to individuals who own less than five percent of the stock of a publicly owned corporation. The provisions of the Code must be strictly adhered to in this area.

Despite a lack of direct financial benefit, MRDA Board members shall recuse themselves from any deliberations, discussion, or voting on agreements with or projects within municipalities represented by that Board member. Representation may include a Board members employment with or elected or appointed position with a municipality.

MRDA members are prohibited from disclosing information deemed to be confidential (i.e. proprietary information; negotiating materials or strategies; personal or medical information, etc.) to any individual, organization or business entity except as may be required as part of their position or as determined to subject to release by the Freedom of Information Commission or a court of competent jurisdiction.

III. Prohibited Activities Upon Leaving MRDA Service (Revolving Door)

The Code prohibits state employees and public officials, which all MRDA members are considered to be, from performing certain activities upon leaving their position. Some of these prohibitions

are limited to specific periods of time. Other prohibitions remain for the individual's lifetime. These situations are very case specific and

members should contact the OSE for guidance. Former members are prohibited from:

- A. Disclosing or using confidential information, gained in the course of their term as an MRDA member, for the financial benefit of any person (lifetime prohibition).
- B. Representing anyone (other than the State or MRDA) concerning any particular matter (a) in which he/she participated personally and substantially while a member of MRDA and (b) in which the State or MRDA has a substantial interest (lifetime prohibition).
- C. For one year after leaving as a member of MRDA, representing anyone (other than the State or MRDA) for compensation before MRDA, concerning any matter in which MRDA or the State has a substantial interest. For purposes of this prohibition, the former member would not be able to have any type of business-related contact on behalf of his/her new employer with members of MRDA, including telephone calls and e-mails. The former member may also not sign any forms or other documents that would be filed with MRDA.
- D. Accepting employment with a party (other than the State or MRDA) to a contract in which they participated substantially, or supervised the negotiation or award of a contract let by MRDA valued at fifty thousand dollars or more. This prohibition exists for one year after separation as an MRDA member if the separation occurs within one year after the contract was signed.

IV. Political Activities

An employee seeking or holding office as permitted by Section 5-266a of the Connecticut General Statutes must notify MRDA Executive Director of this fact in writing.

No MRDA member may engage in partisan political activities while on MRDA duty. Additionally, no MRDA member may use MRDA materials, facilities or equipment for the purpose of participating in or influencing a political campaign and/or election for any public office.

Under some circumstances, members may be covered by the provisions of the Federal Hatch Act. In general, this law covers members whose principal employment is in connection with an activity that is financed in whole or in part by loans or grants made by the United States or a federal agency. There are certain prohibitions that apply to political activity by covered members. The provisions of the Hatch Act continue to apply while the member is on vacation leave, sick leave, leave without pay and personal leave. MRDA members should contact the Executive Director if they think they may be subject to prohibitions under the Hatch Act.

Manner of presenting views: All interested persons are invited to present their views in writing no later than **September 27, 2024**. Comments are to be submitted to the Connecticut Municipal Redevelopment Authority either by e-mail to ctmuniredevelopmentauthority@gmail.com (please put “Public Comment re: Ethics Policy” in the subject line) or by postal mail addressed to them at:

ATTN: CT MRDA
CT Department of Economic and Community Development
450 Columbus Boulevard
Hartford, CT, 06103

**CONNECTICUT MUNICIPAL REDEVELOPMENT
AUTHORITY**

**Notice of Intent to Adopt a Business Travel and
Meal Reimbursement Policy**

In accordance with Conn. Gen. Stat. §1-121, the Connecticut Municipal Redevelopment Authority hereby gives notice that it intends to adopt a Travel and Meal Reimbursement Policy.

Statement of the substance and purpose of the proposed amendments: The Municipal Redevelopment Authority intends to adopt a Business Travel and Meal Policy to govern appropriate business travel by members of staff and Board and parameters for reimbursement.

The text of the policy is included below.

**PROPOSED BUSINESS TRAVEL AND MEAL
REIMBUSREMENT POLICY**

Purpose

This policy provides guidelines and establishes procedures for employees and members of the Board of the Connecticut Municipal Redevelopment Authority (the “Authority”) incurring business travel and meal expenses on the Authority’s behalf. Travel and meal expenses shall only be approved for purposes essential to the mission of the Authority. The primary purpose of these policies is to ensure that costs are limited to those that are reasonable and necessary while providing for the legitimate needs of employees carrying out the work of the Authority. All expenses incurred and approved for business travel and meals shall be in compliance with State and Authority ethics, procurement and other laws and policies.

Pre-Approval

All out-of-state business travel expenses shall be pre-approved by the Executive Director prior to booking travel or incurring such expenses. In the case of the Executive Director, such approval shall be provided by the Chairperson or Vice-Chairperson of the Board.

Responsibility, Enforcement and Oversight

The employee or Board member is responsible for complying with the travel policy.

The Authority assumes no obligation to reimburse employees for expenses that are not in compliance with this policy or are not timely submitted.

Expenses for business travel and meals must be included in the Authority's annual budget and monthly financial reports in one or more as distinctly labeled line-items (e.g. "Business Travel", "Meals and Entertainment"). The Board shall have responsibility for establishing annual amounts for business travel and meal expenses and for monthly monitoring of these and other expenses.

Researching Travel Costs and Use of Government Discounts

The review of costs for airlines, lodging, rental cars and other expenses by those traveling shall include reviews of any State DAS or other contracts related to these costs, review of travel-related websites (e.g. Kayak.com and others) and availability of governmental and other discounts available to all governmental employees and that are consistent with State and Authority Ethics policies.

Rail Service

Employees are expected to use the lowest reasonable rail fare available. Commuter rail should be utilized for trips under 50 miles where such service exists and when schedules enable the business activity. For inter-city trips, travel shall be in regular or coach class. For travel within the Northeast Corridor, employees or Board member may demonstrate that Acela schedule better facilitate the business purpose of the trip. In those instances, the base level Acela service, business class is permissible.

Upgrades are allowed at the employee's or Board member's personal expense.

Airline Service

All air travel must be in Coach class. Employees and Board members are expected to use the lowest reasonable airfare available.

Upgrades are allowed at the employee's or Board member's personal expense.

Lodging

When approved as part of business travel, employees and Board members are entitled to stay in a single room with a private bath. Travelers may accept room upgrades to suites or executive floor rooms if the upgrade does not result in additional cost to the Authority or conflict with the Authority's Ethics Policy or conflict of interest provisions. Travelers may upgrade at their personal expense.

Lodging expenses shall not exceed the federal per diem GSA rates by more than 50 percent. Requests for exceptions to this limit shall be noted in travel approval requests and the justification for any exceptions are to be provided as part of such request.

It is the responsibility of the employee or Board member to cancel the room prior to the deadline if business needs require a change in travel plans.

Out-of-State Lodging

When traveling for business out-of-state, employees or Board members may stay in a hotel room on the eve of any days during which business meeting will take place and on the evening of any days during which business meetings take place.

In State Lodging.

In-state lodging shall only be permitted for the evening(s) between two or more consecutive days of business meetings greater than 75 miles from the employee or Board member's home or when inclement weather or other extenuating circumstances exist.

Rental Car

Employees may secure in advance a rental car at their out-of-state destination when:

- it is less expensive than other transportation modes, or
- entertaining customers or clients, or
- business meeting locations are spread out and not connected by other means of transportation.

Rental cars must be Compact or Intermediate class. Travelers may accept car upgrades to higher class vehicles if the upgrade does not result in additional cost to the Authority or conflict with the Authority's Ethics Policy or conflict of interest provisions. Upgrades are otherwise allowed at the employee's or Board member's personal expense.

At the time at which the Authority has suitable coverage in its general liability policy to cover these situations, employees should decline all insurance coverage when renting a car for Authority use.

Personal Car Usage

Employees and Board members will be reimbursed for business usage of personal cars on a fixed scale in accordance with annual IRS mileage allowances in addition to tolls, parking and other directly related expenses.

For employees, when traveling for work, any travel distance which is less than your normal daily commute to the MRDA office is not reimbursable. For longer trips, the normal commute distance shall be deducted from any driven distance that exceeds the normal daily commute when seeking reimbursement. In the absence of an MRDA office, an employee's home shall be considered their daily location for calculation of reimbursable mileage.

For Board members, mileage reimbursement is calculated as the distance from their home address or place of business to and from the site of MRDA business meeting.

There shall be no reimbursement for any repairs to employee's or Board member's personal vehicle even if these costs result from business travel.

Personal/Companion Travel

Personal vacation travel may be combined with business travel provided there is no additional cost to the Authority.

A spouse or other individual may accompany an employee or Board member on a business trip at the traveler's sole expense.

Personal Meals

An employee or Board member's meal expenses shall be reimbursed when the traveler dined alone during an out-of-state business trip. Reimbursement will be made according to actual and reasonable cost incurred. Meals will not be reimbursable if attending an event at which the meals are part of the registration fee. The Authority shall not reimburse any employee for the cost of alcohol.

Business Meals

Business meals are defined as those taken with external individuals that are necessary for the purposes of MRDA and during which a specific business discussion takes place. Employees will be reimbursed for business meal expenses according to actual and reasonable cost. Such business meal expenses, no matter whether paid by the Authority or any other person or entity, shall be consistent with the Authority's ethics and other policies. The Authority shall not reimburse any employee for the cost of alcohol consumed by them, Board members, or external individuals.

Two or more employees discussing business over a meal will not be considered a Business meal nor be eligible for reimbursement unless those employees are traveling together out-of-state for business or an external individual relevant to that business is present.

Tipping

Tips included on meal receipts will be reimbursed. As a general rule, employees should not tip more than 20% of the cost of the meal.

Other types of tips for porters, maid service, etc. should be reasonable and will be reimbursed.

Expense Reporting and Documentation

An expense report form is required to be completed to request reimbursement for incurred eligible travel and meal expenses.

The expense report is to be completed and submitted for reimbursement in a timely manner. An expense report form must be completed by the employee or Board member by the end of the

month following that within which the expenses were incurred to request reimbursement for travel and meal expenses.

The type of expense and dollar amount must be separated on a daily basis. For example: a hotel bill may include meals, lodging and telephone expenses. Each category must be split and entered in the appropriate space on the expense report form with expenses allocated for each travel day.

A receipt must be submitted with the expense report for any individual reimbursable expense of greater than \$5.00 excluding mileage. Receipts must include the name of the vendor, location, date and dollar amount of the expense. When a receipt is not available, a full explanation of the expense and the reason for the missing receipt is required. Mileage must be documented with a map showing distances traveled for which reimbursement is being sought.

For business meals, in addition to receipts, the expense report must include the names of individuals present, their titles and company name as well as the specific business topic discussed.

Approval / Authorization Process

All expense reports must be submitted to the Executive Director. The Executive Director's expense report will be submitted to the Chairperson or Vice-Chairperson of the Board. Individuals approving expense reports are responsible for ensuring:

- The correctness, reasonableness and legibility of entries,
- Applicable receipts are attached,
- Charges are consistent with policy and were incurred for business purposes,
- Expenses are adequately explained, and
- The expense report is signed by the employee.

In accordance with present rules and guidelines, charges that are questionable should be discussed with the employee and resolved before the expense report is approved.

Expense reports that are incorrect or incomplete will be returned to the employee for corrective action and may result in delay or non-reimbursement of specific items.

Violating the Authority's policy or altering of receipts can result in disciplinary action.

Manner of presenting views: All interested persons are invited to present their views in writing no later than **September 27, 2024**. Comments are to be submitted to the Connecticut Municipal Redevelopment Authority either by e-mail to ctmuniredevelopmentauthority@gmail.com (please put "Public Comment re: Travel Policy" in the subject line) or by postal mail addressed to them at:

ATTN: CT MRDA
CT Department of Economic and Community Development
450 Columbus Boulevard
Hartford, CT, 06103
