



CONNECTICUT
Port Authority

Connecticut Port Authority

Operating Procedures

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I. GENERAL PURPOSE

The general purposes of the Connecticut Port Authority (“Authority”) are described in [Sections 15-31a to 15-31o, inclusive, \(Chapter 264a\)](#) of the Connecticut General Statutes as amended from time to time (the “Act”).

II. GOVERNANCE

Connecticut Port Authority, a quasi-public agency of the State of Connecticut , shall be governed by a Board of Directors (“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, the Authority's [Bylaws](#) and such policies with respect to corporate governance as are adopted by the Board from time to time.

III. ADMINISTRATION

The Board shall appoint an Executive Director in accordance with the Act and the Connecticut General Statutes, who shall have the duties and responsibilities set forth therein and in the Bylaws. The Board may also appoint a Chairperson and such other officers as provided in the Bylaws. Under the direction of the Board, such officers shall conduct the business of the Authority and shall have such authority as is conferred by the Act, the Bylaws, these Operating Procedures, the Board and any other applicable laws and/or regulations. 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 Bylaws of the Authority.

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.

V. PERSONNEL POLICIES

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

Hiring & Promotions: At least annually, the Board shall approve a Schedule of Positions and Total Staffing Levels for the Authority. The Schedule of Positions shall include the signature authority, if any, of each position. The Executive Director may from time to time 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. As may be permitted under the Act, 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 internally and publicly advertised in a manner reasonably designed to reach a range of possible applicants. See Hiring Guidelines (Appendix A) for more information. A current employee shall be eligible for promotion or reclassification to an existing or new position only if such employee has at least six (6) months of service with the Authority and meets the minimum qualifications for such position.

Notwithstanding any other provision of this section or any employee manual or other personnel policies of the Authority, 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, dismissal and severance, shall be in the discretion and subject to the approval of the Board. Hiring and promotion shall in all cases be in accordance with the Authority's Equal Employment Opportunity and Affirmative Action Policy (Appendix B) and applicable law.

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

1. a compensation plan, which shall consist of sufficient salary ranges to provide such compensation rates as may be determined to be necessary or desirable for all positions within the Authority, and which may include an incentive compensation program for all positions;
2. an employee benefits program, which may include vacation days, holidays, sick days, group health, life and disability insurance, tuition reimbursement, 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 severance pay and benefits;
5. policies with respect to business and travel reimbursement; and
6. 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 as 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 the Authority.

The Executive Director shall be empowered to administer the Authority'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 responsibilities 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 the committee of the Board with responsibility for matters of compensation. The Board shall review the Authority's compensation plan and employee benefit programs as part of its annual review of the Authority's budget and plan of operation.

Dismissal: Employment with the Authority is at will, which means that either the employee or the Authority may terminate the relationship at any time for any reason, with or without cause and with or without notice. The Executive Director has the authority to determine and implement any level of disciplinary action, up to and including termination, based upon the severity of the offense, the employee's past work record, and other relevant factors. This in no way alters the at-will employment policy. See Appendix C "Onboarding/Offboarding Policy" for more information.

VI. CONTRACTING FOR PERSONAL SERVICES AND PERSONAL PROPERTY

SECTION A. PREAMBLE AND APPLICABILITY

The Authority's purchasing philosophy is that purchases should, wherever possible, result from a competitive process whereby qualified vendors vie to obtain the Authority'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.

This Purchasing Policy, however, is 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); general office supplies; subscriptions and reference materials; sponsorships; professional, industry, business dues and continuing education, and similar items.

Since no policy can identify every situation and exception, this Purchasing Policy (the "Policy") requires all parties involved in the negotiation, performance, or administration of purchases 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 the Authority. See Ethics Policy (Appendix D) for additional information.

SECTION B. ACQUISITION AND CONVEYANCE OF INTEREST IN REAL PROPERTY

The Authority, acting through the Executive Director or another duly authorized officer, shall, pursuant to the Act and subject to the requirements and limitations of this this policy, have the authority to invest in, acquire, lease, purchase, own, manage, hold and dispose of real property, and to lease, convey or deal in or enter into agreements with respect to such real property, on any terms deemed necessary or incidental by such officer to the carrying out of the statutory purposes of the Authority.

Procurement Procedures: The Board shall, prior to the commencement of any transaction or procurement under this Section, 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 the Authority 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.

SECTION C. PURCHASE OF PERSONAL SERVICES, PERSONAL PROPERTY AND OTHER GOODS AND SERVICES

The Authority, acting through the Executive Director or another duly authorized officer, shall, subject to the requirements of State law and this policy, have the authority to: (A) invest in, 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) engage accountants, attorneys, appraisers, financial advisers, investment advisers, underwriters, investment managers, investment bankers, brokers, architects, construction managers, engineers and other consultants and professionals, and (C) purchase other goods, services and commodities and to make such purchases on terms necessary or incidental to carrying out of the purposes of the Authority pursuant to the Act.

Procurement Procedures: Transactions related to personal property and the purchase of professional services and other goods and services, with the exception of those exempted under Section A of this policy, shall occur in accordance with the following procedures:

- 1. Public Solicitation Defined.** As used 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.

- 2. Threshold Costs Defined.** The expected cost thresholds contained in this Policy are based on the expected “net” costs to the Authority – i.e., expected costs after applying rebates, reimbursements or credits owed or received under any contract or agreement related to such personal property, personal services or goods and services. As an example only, the Authority wishes to purchase and install new lighting fixtures expected to cost \$45,000 and anticipates receiving \$25,000 in federal or state rebates in connection with that purchase. The expected “cost” is \$20,000 -- the expected net amount of the purchase ($\$45,000 - \$25,000 = \$20,000$).
- 3. Requirements for Purchases Greater than \$5,000 and Less than \$50,001.** For these purchases, a Public Solicitation is not required; however, the CPA shall:

 - i. *For Goods or Services greater than \$5,000 but equal to or less than \$20,000.* Verbal quotes from at least three (3) vendors shall be sought.
 - ii. *For Goods or Services greater than \$20,000 but equal to or less than \$50,001.* Written quotes from at least three (3) vendors shall be sought.
 - iii. *Obtaining Verbal or Written Quotes.* If obtaining at least three quotes is not possible, the Authority shall obtain such quotes as it is able.
- 4. Requirements for Purchases Greater than \$50,000.** Such purchases shall be by a Public Solicitation, except as otherwise allowed in this policy.
- 5. Exceptions to the Requirements for Verbal or Written Quotes or Public Solicitation.** The Executive Director, or such another duly authorized officer, shall have the authority to waive the requirements that the Authority 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:

 - i. 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.
 - ii. 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 Authority service or function that will adversely affect the Authority’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.

- iii. 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 the Authority's best interest.
- iv. 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.

6. Other Allowable Procurement Methods. The following purchasing methods may, after analyzing the options, be utilized by the Authority in lieu of seeking quotes or issuing a Public Solicitation of its own:

- i. 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.
- ii. Purchases from or through any federal, state or municipal governmental surplus property program, including the Connecticut State Surplus Property Program.
- iii. 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.
- iv. In any case where the Authority is receiving or providing financial assistance in conjunction with another state agency or quasi-public authority, nothing in this section shall prohibit the Authority 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.

7. Board Action regarding Contracts Over \$50,000 and Amendments; Non-budgeted expenditures over \$5,000. 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 or designee for not conducting a public solicitation related to the additional funding. Board approval is required for any nonbudgeted expenditure in excess of five thousand dollars (\$5,000).

8. 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.

SECTION D. APPROVAL REQUIREMENTS FOR ALL PURCHASES AND PAYMENTS

All purchases from and payments to vendors shall receive prior approval by certain supervisors, managers or officers as required by the related written policies and procedures established in this regard by the Authority.

SECTION E. SOLICITATION OF PROPOSALS FOR CERTAIN SERVICES

The Authority shall solicit proposals at least once every three (3) years for financial, legal, bond, underwriting and other professional services required by the Authority on a regular and ongoing basis. The Authority shall not contract with the same person, firm or Certified Public Accountant to conduct financial audits of the Authority for more than six (6) consecutive fiscal years.

SECTION F. 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 the Authority. Such file shall be created and retained in accordance with any applicable records retention laws and policies. Per the [General Records Retention Schedules for Municipalities, M1- General Administration Records](#), minimum retention required for contracts for construction is six (6) years after completion of project, and for contracts for services and supplies is three (3) years after expiration.

VII. STATE CONTRACTING REQUIREMENTS

Any solicitation of bids or proposals by the Authority, and any award of a contract by the Authority, 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:

- [Sections 9-612\(f\) & 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 prospective state contractors;
- [Section 4-252 of the General Statutes](#) relating to affidavits as to gifts from contractors under certain large state contracts;
- [Section 4a-81 of the General Statutes](#) relating to affidavits with respect to consulting fees;
- [Section 3-13l of the General Statutes](#) relating to the prohibition of finder's fees in connection with investment transactions;

- [Section 3-13j of the General Statutes](#) relating to the disclosure of third party fees attributable to investment services contracts;
- [Section 4-61dd of the General Statutes](#) relating to whistleblower protections; and
- [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.

VIII. PROPERTY CONTROL MANUAL GUIDELINES

The Property Control Manual ensures that all State agencies have policies and procedures in place to ensure that all assets currently owned, purchased under a long-term lease, or certain non-owned property in possession of the State where insurance is required be properly recorded and reported by each respective State agency and establishes guidelines for providing adequate oversight.

Notwithstanding that the Property Control Manual applies directly to State agencies, the Authority is required to comply with certain provisions of the Manual referencing statutory requirements applicable to the Authority such as (a) notifying the Auditors of Public Accounts and the Comptroller of any (1) unauthorized, illegal, irregular or unsafe handling or expenditure of state or quasi-public agency funds, (2) breakdowns in the safekeeping of any other resources of the state or quasi-public agencies, (3) breach of security, or (4) contemplated action to commit one of such acts under [Section 4-33a](#) of the Connecticut General Statutes, and, (b) declaring surplus property through the DAS Surplus System.

Additionally, the Authority must comply with certain statutory reporting requirements relating to (a) summarizing its activities, disclosing operating and financial statements and recommending legislation to promote its purposes, among other things, under [Sections 15-31a\(k\)](#) and [15-31a\(o\)](#), and, (b) submitting an audit prepared by an independent accounting firm under [Section 15-31a\(l\)](#).

Lastly, while the Authority may invest in, acquire, lease, purchase, own, manage, hold and dispose of real property and lease, convey or deal or enter into agreements with respect to such property on any terms necessary or incidental to carrying out the purposes of Sections 15-31a to 15-31i, inclusive without being subject to approval, review or regulation by any state agency pursuant to title 4b or any other provision of the Connecticut General Statutes, the Authority may not convey fee simple ownership in any property associated with the ports or harbors under its jurisdiction and control without the approval of the State Properties Review Board and the Attorney General, and at least until July 1, 2026, the Authority shall be a state contracting agency subject to the authority of the State Contracting Standards Board.

IX. ISSUING AND RETIRING BONDS, BOND ANTICIPATION NOTES AND OTHER OBLIGATIONS OF THE CONNECTICUT PORT AUTHORITY

The Board shall approve the issuance and retirement of all bonds, bond anticipation notes and other obligations of the Authority. The issuance of any bonds, bond anticipation notes or other obligations of the Authority 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.

X. FREEDOM OF INFORMATION ACT

The Authority follows the State of Connecticut's Freedom of Information Act (FOIA) requirements. A complete copy of the Freedom of Information Act is available on the State website at https://www.cga.ct.gov/2021/pub/chap_014.htm.

XI. AMENDMENT OF PROCEDURES

At least annually, the Audit, Compliance, and Governance Committee of the Board shall meet to review and discuss the matters addressed by these Procedures and, as necessary, make recommendations for amendment of these Procedures to the Board. Amendments to these Procedures shall be effective only upon approval of the Board. For additional information, see https://www.cga.ct.gov/current/pub/chap_012.htm#sec_1-121.

APPENDIX

Appendix A	Hiring Guidelines
Appendix B	Equal Employment Opportunity and Affirmative Action Policy (EEO-AAP)
Appendix C	Onboarding/Offboarding Policy
Appendix D	Ethics Policy

Hiring Guidelines

Hiring and promotion issues and decisions shall be made consistent with the Operating Procedures of the Connecticut Port Authority, including Section V entitled “Personnel Policies”. In addition to the requirements set forth in the Operating Procedures, the following guidelines shall also generally apply:

- At least annually, the Authority shall review, and revise as needed, the Schedule of Positions and Total Staffing Levels determined pursuant to the Operating Procedures for presentation to the Human Resources Committee who may make recommendations to the Board for revisions to such Schedule of Positions and Total Staffing Levels.
- The Schedule of Positions and Total Staffing Levels shall include, for each position (in addition to signature authority as currently required by the Operating Procedures), Job Title; Salary Range; Job Duties; and Qualification Requirements.
- Once a position is created, a job description will be developed if one does not exist. The job description should include the essential functions of the job and any experience and educational requirements.
- Any job opening that is advertised shall be posted on the Authority’s website and other sites in support of the Authority’s Equal Employment Opportunity (EEO) and Affirmative Action Policy. Job postings must include the Authority’s EEO statement.
- A Selection Committee should be assigned to manage the hiring process, which shall include the Executive Director or his/her designee and two other individuals. The Selection Committee shall review resumes and applications and select candidates for interviews. The Selection Committee shall conduct the interviews in a fair manner, asking questions that are similar across all candidates. The Selection Committee shall meet to discuss the candidates and conduct interviews and shall make a hiring recommendation. The Executive Director shall make the final hiring decision in consultation with the Board.
- Prior to any final hiring decision, reference checks shall be conducted along with applicable background checks. Any additional pre-hire screenings may also be conducted.

Note: All hiring decisions will be made consistent with the Authority’s Equal Employment Opportunity and Affirmative Action Policy set forth in the Employee Manual, Operating Procedures, and pursuant to applicable law. In the event of a conflict between the Employee Manual, the Operating Procedures and these hiring guidelines, the provisions of the Operating Procedures shall prevail. In the event of a conflict between the Employee Manual and these hiring guidelines, the provision of the Employee Manual shall prevail.

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Equal Employment Opportunity and Affirmative Action Policy

It is the policy of the Connecticut Port Authority (Authority) to provide equal employment opportunities to all applicants and employees regardless of race, color, religious creed, sex, sexual orientation, gender identity 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 the Authority to take affirmative action to employ and to advance in employment, all persons regardless of race, color, religious creed, sex, sexual orientation, gender identity 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 actions, 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, including apprenticeship, at all levels of employment.

Employees and applicants of the Authority will not be subject to harassment on the basis of race, color, religious creed, sex, sexual orientation, gender identity 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 (EEO) law is prohibited. For information regarding the Authority's policy for addressing complaints of harassment, please refer to the Policy Against Sexual Harassment in the Authority's Employee Manual.

The Authority is committed to the principles of Equal Employment Opportunity and Affirmative Action. In order to ensure dissemination and implementation of Equal Employment Opportunity and Affirmative Action throughout the Authority, the Board of Directors of the Authority has the overall responsibility for the establishment of the affirmative action policies of the agency. The Chairperson of the board maintains ultimate responsibility for the implementation of the Equal Employment Opportunity and Affirmative Action Policy for all staff and the Executive Director is charged with the day-to-day responsibility.

Employees who feel they have been treated less favorably on the basis of any protected characteristic should contact the Authority's Executive Director (860-577-5174) or the Chairperson of the Board of Directors immediately. Retaliation for making a complaint or otherwise participating in an investigation of potential violations of this policy is not tolerated.

In furtherance of the Authority's policy regarding Equal Employment Opportunity and Affirmative Action, the Authority will present an annual internal workforce analysis to be distributed to the Board of Directors no later than June 30 of each fiscal year, to ensure that its policy of nondiscrimination and affirmative action for women, minorities, individuals with disabilities, and protected veterans is accomplished.

The Authority's EEO statement is listed on its website at <https://ctportauthority.com/employment/>. "The Connecticut Port Authority is an equal opportunity and affirmative action employer. We welcome all candidates to apply regardless of race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, age, disability, or genetic information."

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Onboarding / Offboarding Policy

Onboarding

The purpose of this policy is to ensure that all new employees of the Connecticut Port Authority (“Authority”) are welcomed, informed, and equipped to perform their roles effectively while understanding the Authority’s mission, vision, and statutory responsibilities.

The Authority will work with the Human Resources (“HR”) Contact at CT Innovations, as per the Memorandum of Understanding (“MOU”), to perform the following onboarding procedures:

- Issue offer letter to include start date, rate of compensation and at-will employment, pending successful completion of reference checks and any and all applicable background checks.
- Completion and submission of all required hiring paperwork.
- Provide information regarding benefit package and collect and submit all required forms.
- Provide Employee Handbook with required acknowledgement of review and receipt.
- Provide a copy of the Authority’s Policies and Procedures with acknowledgement of review and receipt.
- Provide overview of Employee Performance Management to include performance review within the first six (6) months of employment (the introductory period).
- Schedule onboarding call with HR Contact to review CORE-CT and timesheet submittal process.
- Review any and all training requirements and timelines as applicable, including annual Ethics training.
- Finance Director/Ethics Liaison Compliance Officer will notify relevant positions of the requirement for filing the Statement of Financial Interest (SFI).
- Orientation to include meeting with supervisor and staff; provision and set-up of email, phone, keys and any other equipment with appropriate access as applicable; and timeline for ongoing training on systems, processes and procedures.

Offboarding

The purpose of this policy is to ensure a consistent, secure, and respectful process when an employee separates from the Authority, whether through resignation, retirement, termination, or other.

The Authority will work with the HR Contact at CT Innovations, as per the MOU, to perform the following offboarding procedures:

- It is expected that employees will provide written notice to their supervisor of resignation to include separation date.
- For terminations, the Authority will provide written notice to the employee in coordination with the HR Contact.
- A copy of the written notice will be included in the personnel file.
- Supervisor to notify the Office Manager or other staff as appropriate for initiation of the Information Technology (IT) service provider offboarding process with regards to email, access to software/hardware, and any assigned equipment.
- It is expected that departing employees will document ongoing projects, key contacts, and relevant procedures to ensure a smooth transition of duties.
- All property of the Authority must be returned to the Authority by the last working day, including any equipment, keys, credit cards or other assigned property.
- Failure to follow this policy may result in delays in final pay or other administrative processes.
- The Authority will work with the HR Contact to process final pay in accordance with applicable laws and Authority policy. Information on benefits continuation (e.g., COBRA) will be provided where applicable.
- The HR Contact may conduct an exit interview to gather feedback and address any outstanding matters.

Ethics Policy

Background:

The Connecticut Port Authority (Authority) 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 the Authority. 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 the Authority have with the public, other governmental organizations and representatives, and tenants, lessees and contractors, whether they be current or potential.

Policy:

This policy is intended to provide guidance to Authority 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 the Authority with regard to the Code is the guide prepared by the Office of State Ethics (OSE). It may be found on their website at <https://portal.ct.gov/Ethics/Public-Official-and-State-Employees-Information/Public-Official-and-State-Employee-Information>

The provisions of this policy represent the minimum expectations for compliance by members of the Authority. Since it is impossible to articulate in a policy such as this each and every type of issue that may arise for Authority members, they are encouraged to raise questions with the Executive Director, the Authority's Ethics Liaison, their supervisor or manager, or the OSE.

It is expected that all members of the Authority 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 the Authority and will be incorporated as an appendix to the Authority's Operating Procedures and Employee Manual. It will also be included among the materials provided to all new members of the Authority. Finally, the Authority will make this policy available to all vendors, lessees, tenants, contractors and other business entities doing business with the Authority.

I. Gifts and/or Payments

No member of the Authority or member of his/her 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 the Authority 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 Authority member or member of his/her 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 the Authority or other governmental entities. Included among these items are luncheon and/or dinner 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 the Authority:

1. 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 (10) dollars and that the aggregate value of all things given from a single source in any calendar year does not exceed fifty (50) dollars.
2. 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 his/her official capacity, if the amenities are provided by the primary sponsoring agency.
3. Goods and services that are provided to the Authority for use on Authority property or that support an event, and which facilitate CPA action or functions.
4. A certificate, plaque or other ceremonial award provided the cost does not exceed one hundred (100) dollars.
5. A rebate, discount or promotional item available to the general public.
6. 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.
7. 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.
8. 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.
9. Training that is provided by a vendor for a product purchased by the Authority or another state agency on behalf of the Authority which is offered to all customers of such vendor.

Different rules apply to gifts that are offered or solicited from persons or organizations outside the Authority than to gifts offered or accepted among members of the Authority. With respect to gifts between/among Authority members, no Authority member or member of his/her immediate family may give to or receive from a subordinate a gift costing one hundred (100) 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 Authority service. In these cases, the value of the gift may not exceed one thousand (1,000) dollars. It is not permissible for employees to pool their funds to purchase a gift costing more than one hundred (100) dollars or more for a supervisor or subordinate, or over one thousand (1,000) dollars if the gift is for a major life event.

An Authority member may receive from a sponsor or vendor organization payment or reimbursement for necessary expenses only if he/she, in his/her official capacity, actively participates in an event (i.e. giving a speech or presentation, running a workshop, etc.).

Necessary expenses are limited to:

1. Travel (coach or economy class)
2. Lodging (standard cost of room for the nights before, of, and immediately following the event)
3. Meals
4. 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. A Authority member may not receive a fee or honorarium for a speech or presentation given in his/her official capacity. Within thirty (30) 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 Authority you must file an ETH-NE form with the OSE. This form is available on the [OSE's website](#). This form is not required if your necessary expenses were paid by the federal government or by another state government.

Authority members may also be provided with vendor sponsored training for a product purchased by the Authority or another state agency on its behalf provided such training is offered to all customers of that vendor. An Authority 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. This action is necessary even though there is no cost to the Authority. All other official visits to vendor facilities by Authority members must be at the Authority's expense.

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

No Authority member shall allow personal business or obligations to take precedence over his/her responsibilities to the Authority. 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, a Authority member is not prohibited from engaging in outside employment so long as there is no actual or apparent conflict of interest.

Authority 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 Authority duties. Any outside employment or other activity that might discredit or reflect unfavorably on the member or the Authority must be avoided. Members are prohibited from performing work for any business that is in a contractual relationship with the Authority. Authority 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).

Authority 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 the Authority. The question of what constitutes impairment will be determined by the OSE. A Authority supervisor, manager or director may not employ a Authority employee-subordinate in his/her outside business. So too, it is impermissible for a Authority employee-subordinate to employ a Authority 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 Authority 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 the Authority, nor can any Authority member or member of his/her immediate family, or business with which he/she is associated, enter into a personal services contract or other contract with the Authority or the State of Connecticut, other than a contract of employment as a Authority employee or with another state agency, valued at \$100 or more unless the contract has been awarded through an open and public process.

An Authority member is prohibited from using his/her position with the Authority for financial gain for such member, his/her spouse, child, child's spouse parent, brother, sister or business with which he/she is associated. Additionally, no Authority member shall have, directly or indirectly, a financial interest in any business, firm or enterprise doing business with the Authority 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 (5) percent of the stock of a publicly owned corporation. The provisions of the Code must be strictly adhered to in this area.

Authority 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 State or Authority Service (Revolving Door)

The Code prohibits state employees and public officials, which all Authority 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:

1. Disclosing or using confidential information, gained in the course of his/her term as a Authority member, for the financial benefit of any person (lifetime prohibition).
2. Representing anyone (other than the State or the Authority) concerning any particular matter (a) in which he/she participated personally and substantially while a member of the Authority and (b) in which the State or the Authority has a substantial interest (lifetime prohibition).

3. For one (1) year after leaving as a member of the Authority, representing anyone (other than the State or the Authority) for compensation before the Authority, concerning any matter in which the Authority 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 the Authority, including telephone calls and e-mails. The former member may also not sign any forms or other documents that would be filed with the Authority.
4. Accepting employment with a party (other than the State or the Authority) to a contract in which he/she participated substantially, or supervised the negotiation or award of a contract let by the Authority valued at fifty thousand (50,000) dollars or more. This prohibition exists for one (1) year after separation as an Authority member if the separation occurs within one (1) 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 the Authority Executive Director of this fact in writing.

No Authority member may engage in partisan political activities while on Authority duty. Additionally, no Authority member may use Authority 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. Authority members should contact the Authority Executive Director if they think they may be subject to prohibitions under the Hatch Act.

V. Other Provisions

A. Actions Involving Relatives, Friends and Acquaintances

No Authority member shall use his/her position or influence to gain employment for a relative, person having a special relationship, business partner, associate, client, etc. Relatives or others having special relationships with current members are not prohibited from seeking employment with the Authority. However, no influence can be exerted to give the relative or person having a special relationship an advantage over others in the competitive selection process. Any such relationship must be disclosed during the competitive selection process and prior to any offer of employment being made. Relatives or others having special relationships with current members may be considered for employment provided that the relative or person having a special relationship with a current member would not be placed either in or under the direct supervision of the member or in any position where either the member, the relative or the person having a special relationship with a current member would be in a position to influence the salary, benefits, working conditions or other personnel transactions such as performance reviews or disciplinary transactions affecting the other. This provision shall not be interpreted to require the automatic transfer, reassignment,

or other personnel change, when such relationship exists upon implementation of the policy. The Authority reserves the right to take appropriate corrective action to remedy problems that may be created by such relationships.

Members should be aware that signing certain documents may result in a violation of the Code if such actions would result in a financial benefit to a relative. Examples would be personnel forms, including performance appraisals, vouchers, reimbursement forms, contracts and similar types of forms. Caution is urged as a violation may occur even though unintentional.

B. Use of Authority Equipment

The use of Authority equipment, including tools, telephones, computers (including e-mail), fax machines and vehicles for personal, non-work related purposes is prohibited. (Please refer to the Authority policy regarding the acceptable use of computers and related equipment).

C. Personal Advertising, Solicitation and Sales

An Authority member shall not solicit or canvass within the Authority for the sale of any goods, services or personal business without the prior expressed written approval of the Executive Director or his/her designee. Such soliciting or canvassing, even with permission, shall not involve soliciting from subordinates, nor shall it be done on Authority work time.

This prohibition does not extend to charitable fund-raising activities approved by the Executive Director such as the Connecticut State Employees Campaign for Charitable Giving or events sponsored by Authority to recognize members and/or promote member morale.

An Authority member is not allowed to post or distribute advertising material for such purposes without the prior expressed written permission of the Executive Director or his/her designee. No Authority member is allowed to use his/her Authority business address, telephone number, title or status in any way to promote, advertise or solicit personal business.

Revision History:

Version 2: Amended draft proposed March 17, 2026

Version 1: [September 4, 2019](#)