

Speeding Up the Process:
A Case Study on State Government Hiring

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AI Disclosure: AI was used in an earlier draft to create an executive summary for policymakers, which I then edited further. However, I have not used AI for any other component of this Paper in any way.

Abstract: Connecticut, like many states, faces a hiring problem. But this is not a problem of limited budgets; it is a problem of speed. For the vast majority of positions, agencies must choose between hiring quickly and hiring well, leaving the state at a competitive disadvantage compared to other sources of employment. This dilemma stems from two main culprits, each of which contributes to limiting the discretion otherwise granted to agency hiring managers: mandatory lists and affirmative action plans. Mandatory lists limit agency discretion by requiring agencies to consider internal candidates before external candidates, even if internal candidates may not be as qualified as external candidates. Affirmative action plans limit agency discretion by incentivizing detailed, careful procedures to avoid future consequences and introducing uncertainty into agency hiring requirements. While each has its strong defenders, there are still legitimate reasons to consider limiting or eliminating each obstacle. Neither appears to accomplish their main purposes of worker benefits or structural fairness. Meanwhile, limiting them could yield benefits both in advancing those goals and in making state hiring more efficient.

I. Introduction

In mid-November of 2025, an attorney with Connecticut’s Department of Social Services (DSS) realized they needed to hire new personnel. The Department had received a grant to begin a new program, but DSS did not have the capacity to properly implement it. The grant meant that DSS didn’t have to worry about state budget approval; the money was already in hand. All the attorney had to do was start the hiring process. It would not be easy.¹

What follows is a brief summary of the steps the DSS attorney had to follow to complete the hiring process. It is not provided as a thorough breakdown of each component of the hiring process. Instead, this summary is provided as a glimpse into a confusing process, where no less than four agencies and countless statutory, regulatory, contractual, and customary processes will

¹ Information regarding this particular hiring process comes from a combination of statutory and regulatory analysis, *infra* Part IV, and an interview with a hiring attorney at the Department of Social Services, who wished to remain anonymous. Zoom Interview with Anonymous, Att’y, Conn. Dep’t of Soc. Servs. (Feb. 9, 2026).

make an appearance to fill a single position. In other words, the focus of this summary is on the overall approach to state government hiring—not the finer details.

First, the attorney had to get the approval of leadership within DSS itself. Using formal structures internal to DSS, the Commissioner and CFO double-checked that the position was actually required for the agency to do its job well. Once both signed on to the request, DSS sent it to a different office in a different agency: the Connecticut Office of Policy and Management's Budget Division (OPM). OPM reviewed the request, and it asked a series of questions to the agency to triple-check that the position was required—and that money was available to hire someone (thankfully, this step was easy because of the grant money. Otherwise, OPM would have to look at the state budget). Once OPM was satisfied, the request came back to DSS so that the agency could write the job posting.

Back at DSS, the original attorney and DSS's HR specialists needed to determine what qualifications are necessary for someone to do the job at all: the minimum qualifications. In addition, the hiring attorney and HR specialists had to think about the preferred criteria for someone to be truly successful in the position. And, if they were lucky, they did this in conjunction with another person at DSS: the Equal Employment Opportunity Officer (EEOO). The EEOO helps shepherd the agency through the entire hiring process to ensure that the agency is complying with Connecticut's Affirmative Action policies. If the agency does not comply, it could face an adverse employment action suit, or the state's Commission on Human Rights and Opportunities (CHRO) could institute a hiring freeze for the agency. Of course, the attorney might not be lucky. They might be within an agency that does not have an EEOO. If so, DSS still has to make sure the agency is complying with Affirmative Action policies; it just has to navigate the process on its own.

Meanwhile, DSS staff must also review mandatory lists that have to be exhausted before turning to a new hire. These mandatory lists include promotions, transfers, and reemployments—any state employee who was laid off in the past few years, requested a transfer, or is eligible for a promotion—and many of these lists include the names of those in other agencies who also have to be considered. Agencies are highly encouraged, and in some cases required, to hire first from these lists if any candidate meets those minimum qualifications. Only once those lists are exhausted can agencies begin to look at new hires.

Once the minimum and preferred criteria are determined and the mandatory lists are cleared, DSS sends the profile off to Connecticut's Department of Administrative Services (DAS). DAS houses the state's centralized HR systems, which handle the actual posting of open jobs and first review of applications to ensure compliance with minimum qualifications. Any application that passes muster is sent back to the original attorney, who decides which applicants will be interviewed. The attorney might choose to send out referral questions to further narrow down the applicant pool, but in this case no referral questions are sent. The chosen interviewees are sent to HR to do the actual scheduling.

Before the interviews are scheduled, however, the attorney has to decide the interview panel, and the questions that this panel will ask each applicant. The panel will have to ask each interviewee the same questions, in the same order, without follow up questions. Hiring decisions must also be based solely on interview performance, so the attorney has to be sure that their questions are well-crafted and targeted to selecting the best possible candidate. Once the attorney believes their panel and set of questions are ready, the panel and questions must get approved by both HR and the EEOO. Without that approval, no interviews can take place. Luckily, this

attorney has planned ahead, so the panel and questions were already approved before DAS sent back the list of candidates.

After the panel has interviewed each candidate and the hiring attorney has selected the best candidate, more paperwork remains under the state's affirmative action requirements. For each and every interviewed candidate, the attorney must write a narrative describing why the candidate was or was not hired, with reasoning specific to that candidate and their interview experience. These narratives will later be incorporated into an agency-wide hiring plan, which documents the hiring history of the entire agency over a one- or two- year period. This plan will be submitted to the CHRO for approval or disapproval, where disapproval leads to future oversight, or even the aforementioned hiring freeze. Because of this looming threat of CHRO oversight, the attorney feels compelled to be thorough with their narratives, to head off any allegations or concerns of discrimination. And there is another reason for the attorney to be thorough in his review of interviews. Because of civil service protections, it is incredibly difficult to fire a poor performer. If the attorney makes a bad call at this stage, they may be stuck with their choice for a long, long time.

With the conclusion of the interview process, the attorney extends the offer to the new hire, who has some time to accept or decline. A candidate who accepts the offer cannot start until the next biweekly pay period begins. HR has determined that it is logistically easier to onboard someone at the beginning of these pay periods, both for pay purposes and so that training can be consolidated.

Throughout this process, the attorney has been working at top speed since mid-November, "making extraordinary requests and planning ahead when possible" (such as with the

interview panel and questions).² At this relatively speedy pace, offer letters went out in the second half of February.³ Assuming candidates accepted their offer relatively promptly, new hires would have their first day of work in early March—almost four months since the attorney started the hiring process.

The hiring process described above is slow, and it is confusing. It is easy to get lost in all the moving pieces even when it all goes smoothly.

Of course, the process might not go smoothly. OPM may have to eliminate the line item originally allocated for a position if the legislature tells the governor that the state needs to save more money.⁴ The agency may not have an EEOO. The minimum criteria may not be well crafted. The criteria may be too strict, so that DAS finds no candidate that meets the requirements. Or they may be too loose, so that DAS finds too many that are eligible. In this second case, because of the state's prioritization of reemployment and transfers, the agency may be stuck with a list of candidates who technically fit the minimum criteria, but who do not actually possess the skills required to do the job. In either case (minimum criteria that are too loose or too strict), the agency has to go back to the drawing board and revise the job posting, resulting in a whole new DAS review and candidate search.

The interview panel or questions might not be approved on the first pass. Candidates might be extremely qualified on paper but perform terribly on the interview, or vice-versa; either way, the agency's affirmative action narrative is confined to the interview performance, making it difficult for the hiring manager to justify the first candidate over the second without outright lying. And, even if none of these things happen and the process runs without any hitches, delays

² Zoom Interview with Anonymous, *supra* note 1.

³ *Id.*

⁴ Interview with Josh Geballe, Former Comm'r, Conn. Dep't of Admin. Servs., in New Haven, Conn. (Feb. 18, 2026).

are still inevitable. Every person participating in this process, especially the original hiring manager, is doing lots of other tasks—often ones that are more time sensitive—and it is difficult to prioritize the latest hiring request. As a result of any or all of these problems, the speedy version (which still took just under four months) could easily grow much longer.

This process is not only a headache for current state employees. It is also a nightmare for efficient and effective state administration. In 2021, in the middle of a hiring increase, “agency leaders consistently cited an average of at least 5-6 months to complete the process; in many cases, the process takes up to 33 weeks (7-8 months).”⁵ This long hiring timeline leaves agencies unable to compete with a private sector that, on average, hired in 36 days in 2020.⁶ As one DAS official (who wishes to remain anonymous) put it, “the pace an employer can hire at is an important, competitive (dis-)advantage.”⁷ Good candidates simply don’t wait around for the long months it takes to get hired by the state, especially not when there is another offer waiting elsewhere in the private sector. Or the hiring process itself might give a candidate pause. As Josh Geballe, former Commissioner of DAS, said, “The whole process worked against trying to find the right people. Nobody wants to work at a place where they hire like this.”⁸

There are, of course, other barriers to public sector work, not least of which is the lower pay that state and local government employees receive in comparison to their private-sector counterparts.⁹ But this is a budgetary concern, and solving the hiring problem helps solve the

⁵ BOSTON CONSULTING GRP., CONNECTICUT CREATES REPORT 20 (2021), <https://portal.ct.gov/-/media/office-of-the-governor/news/2021/20210331-creates-final-report.pdf>.

⁶ NEOGOV, TIME TO HIRE REPORT 2 (2020), <https://www.neogov.com/hubfs/NEOGOV-Time-to-Hire-Report.pdf>.

⁷ Zoom Interview with Anonymous, Off., Conn. Dep’t of Admin. Servs. (Feb. 20, 2026).

⁸ Interview with Josh Geballe, *supra* note 4.

⁹ MONIQUE MORRISEY & JENNIFER SHERER, ECON. POL’Y INST. 14 (2024), *The Public-Sector Pay Gap Is Widening. Unions Help Shrink It.*, <https://files.epi.org/uploads/288482.pdf> (“On average . . . government workers’ weekly earnings were 17.6% lower than those of similar private-sector workers after controlling for education, age, hours worked, state and year.”).

budgetary problem. Shorter hiring timelines and greater personnel capacity requires *fewer* resources than the current system; Boston Consulting Group predicted in 2021 that proposed hiring reforms could save the state “millions of dollars in consultants and TWRs [Temporary Worker Retirees].”¹⁰

Moreover, Connecticut’s hiring problem can be tied directly to this arcane process—and not by other, more common explanations like the budget. While the budget is a constraint in the abstract, it historically has not posed a major problem for hiring. Instead, it clearly lays out a number of positions and allocates the associated costs for those positions, establishing a ceiling for agency personnel. But officials in DAS say agencies consistently fail to hit that ceiling, despite the budgetary availability. Mr. Geballe stated that “no agency ever hires up to that level” established by the budget. “You never fully get caught up.”¹¹ The current DAS official confirms that “budget isn’t a problem.”¹²

There has been some improvement in recent years. According to the DAS official, reforms passed by the legislature in 2023 “helped the state recover from the retirement cliff.”¹³ Additionally, since 2023, “big picture data shows that the state is getting closer to the [budgetary] ceiling, but it still can’t reach it. The theory is that the only way to achieve those numbers is to get faster.”¹⁴

Connecticut is not alone in facing a hiring problem. State and local governments face a range of problems when trying to attract top talent, including limited hiring discretion and underinvestment in hiring infrastructure.¹⁵ Those problems are growing in importance as

¹⁰ BOSTON CONSULTING GRP., *supra* note 5, at 23.

¹¹ Interview with Josh Geballe, *supra* note 4.

¹² Zoom Interview with Anonymous, *supra* note 7.

¹³ *Id.*

¹⁴ *Id.*

¹⁵ See, e.g., Caitlin Lewis, *Tackling the Local Government Talent Shortage*, ICMA (Nov. 1, 2025), <https://icma.org/articles/pm-magazine/tackling-local-government-talent-shortage>; Robert Gordon, *Fixing*

government workers age out and retire in large numbers.¹⁶ But Connecticut serves as a useful case study for the broader problem of state and local government hiring. For one, Connecticut's recent progress in more obvious problem areas—such as eliminating most traditional civil service exams—have uncovered less obvious areas of concern. As part of that progress, Connecticut has also begun tracking data from the state hiring process more extensively, making it possible to delve more deeply into which parts of the process are most problematic.

As it turns out, solving the hiring timeline problem is as difficult as explaining its persistence. Those paying attention to this problem tend to focus on well-documented process problems—the statutory and regulatory hurdles that agencies have to jump through to hire and fire someone.¹⁷ These are certainly part of the story in Connecticut. However, agency practices and decision-making, including in hiring decisions, are often tied less to the letter of the law and more to accreted policies and procedures—practices that have solidified over time but that could be changed by the bureaucracy itself.¹⁸ These non-legal practices are the other part of the story in

Government Hiring, THE STATES FORUM, <https://www.statesforum.org/january-book/government-hiring/#endnotes> (last accessed May 2, 2026).

¹⁶ Caitlin Lewis, *supra* note 15 (“The numbers paint a stark picture: with less than 7% of full-time civil service workers under the age of 30 (compared to 20% of the overall workforce) and one-third of government workers eligible to retire this year, it’s clear the public sector is hurtling down an unsustainable path.”).

¹⁷ Judge Glock & Renu Mukherjee, *Radical Civil Service Reform Is Not Radical*, MANHATTAN INST. (MAR. 4, 2025), <https://manhattan.institute/article/radical-civil-service-reform-is-not-radical-lessons-for-the-federal-government-from-the-states> (calling for adoption of at-will employment laws, among other statutory reforms); Jenny Mattingley, *Fixing the Broken Federal Hiring Process Is Critical to Improving Government Performance*, GOV'T EXEC. (Oct. 24, 2024), <https://www.govexec.com/management/2024/10/fixing-broken-federal-hiring-process-critical-improving-government-performance/400476/> (“[N]umerous workarounds have been created . . . meant to bypass some of the arcane processes.”); Judge Glock, *Make the U.S. Civil Service Effective Again*, WALL ST. J. (Mar. 13, 2025, 3:59 PM), <https://www.wsj.com/opinion/make-the-u-s-civil-service-effective-again-efficiency-flexibility-states-b71fe701> (calling for deregulation of the civil service); David N Ammons, *Common Barriers to Productivity Improvement in Local Government*, 9 PUB. PRODUCTIVITY REV. 293, 298-99 (1985) (noting civil service reforms and legal restrictions as common problems in local government productivity, although also noting cultural forces like a “dominant preference for the status quo” and “bureaucratic socialization processes”); Gabe Menchaca & Peter Bonner, *Breaking down the New Memos on Federal Hiring*, NISKANEN CTR. (June 4, 2025), <https://www.niskanencenter.org/breaking-down-the-new-memos-on-federal-hiring/> (celebrating certain changes to OPM hiring regulations).

¹⁸ JENNIFER PAHLKA & ANDREW GREENWAY, NISKANEN CTR., *THE HOW WE NEED NOW: A CAPACITY AGENDA FOR 2025 AND BEYOND* 18-21 (2025), <https://www.niskanencenter.org/wp->

Connecticut. This paper investigates the interplay of these dynamics—the interaction of mandatory and discretionary practices—to explain the persistence of the hiring problem in Connecticut state government and, potentially, in state and local governments across the country.

Specifically, this paper finds that much of the hiring problem can be traced to the state’s treatment of two pieces of the hiring process: (1) union-backed transfer and reemployment lists (mandatory lists) and (2) affirmative action policies. Some of this treatment is legally required; some is the result of miscommunication and misunderstandings about those requirements. The specific mechanisms of mandatory lists and affirmative action policies may not be present in every state. But the operation of those mechanisms in Connecticut exemplifies the ways in which policies that are initially intended to benefit completely separate values—here, collective bargaining and equity in state government—can frustrate efficient and effective hiring in unexpected ways.

The paper uses Connecticut as a case study to examine the current state hiring problem, proceeding in five further Parts. In Part II, I clarify the extent to which the hiring crisis is indeed a real crisis, building on existing literature on state capacity to contextualize the importance of rapid hiring processes capable of hiring effective workers and sensitive to immediate needs. Then, in Part III, I describe the current state of Connecticut’s hiring processes, using data collected by the state itself to highlight how severe—and how perplexing—the problem is. In Part IV, I provide an overview of the statutes, regulations, and collective bargaining agreements (SRCBAs) that are at play in the hiring process. In addition to the statutes and regulations themselves, this overview draws on five interviews with current and former state officials

content/uploads/2024/12/Niskanen-State-Capacity-Paper_-Jen-Pahlka-and-Andrew-Greenway-2.pdf (explaining how broad principles are made rigid over time through hierarchical reinforcement of specific interpretations and operationalizations).

describing how these SRCBAs operate in practice, as well as a review of the seventeen collective bargaining agreements to which the state is a party and an original compilation of CHRO decisions on every affirmative action plan submitted in 2025.¹⁹ This compilation also includes a brief description of the outcomes of each of the previous five plans submitted by those forty-two agencies.

Finally, in Part V, I suggest possible reforms to mitigate or eliminate the barriers uncovered by Part IV. These reforms range from significant statutory changes eliminating certain procedures to more modest logistical suggestions to ease the burden of those processes.

II. State Capacity

Hiring timelines are but one part of a broader concern about “state capacity,” defined by David Schleicher and Nicholas Bagley as “the ability of the government officials, or the people themselves, to use legislation and administration to advance their goals or produce good policy.”²⁰ A low capacity state will, in general, make worse decisions more slowly and less cost effectively than a high capacity state makes better decisions. It is very much in the interest of the public, then, to have high state capacity.

Much of the literature on state capacity centers on the federal government.²¹ But, as Schleicher and Bagley argue, state and local governments are even worse off: despite the lower prevalence of legislative gridlock, states are often more bogged down in administrative

¹⁹ These interviews include conversations with Josh Geballe (former Commissioner of DAS), Tanya Hughes (Executive Director of CHRO), and Johnette Tolliver (State Program Manager for Affirmative Action and Contract Compliance at CHRO). I appreciate each immensely for being willing to go on the record and provide insight and clarity on the operation of Connecticut’s state hiring process. Interviews also include conversations with two current staff, one at DSS and one at DAS, who both wished to remain anonymous. Their comments are included to illustrate agency practice and staff perspectives on the current hiring process. However, all referenced legal requirements have also been confirmed via the SRCBAs and cited accordingly. See Appendix B for the compilation of CHRO decisions on affirmative action plans.

²⁰ David Schleicher & Nicholas Bagley, *The State Capacity Crisis*, 66 B.C.L. REV. 2301, 2304 (2025).

²¹ See, e.g., PAHLKA & GREENWAY, *supra* note 16.

procedures that slow down decisions, making governance even more costly at a time when states are constrained by tight budgets.²²

Connecticut is a perfect example of these concerns. Democrats have controlled both houses of the state legislature and the governorship since 2011.²³ Connecticut is also less than ten years out from a significant budget crisis, sparked by unfunded pension debt and a shrinking tax base.²⁴ Despite significant progress in tackling these problems, recent estimates predict that the state still holds \$35.1 billion in unfunded pension obligations.²⁵ Connecticut also has an aging population, meaning the working tax base will continue to shrink even as the population creeps up.²⁶ As for regulations, Connecticut's regulatory landscape is hardly the most severe (Connecticut's Administrative Code is smaller than 29 states'), but its 98,997 restrictions still increase burdens on the state when added to regulations promulgated by the federal government.²⁷

Personnel have particularly significant ripple effects for state capacity. The quality and quantity of state personnel are directly correlated to the outcomes of state initiatives. With fewer employees in a state's Department of Transportation, agencies are pushed to rely more heavily

²² Schleicher & Bagley, *supra* note 18, at 2306-11.

²³ *Party Control of Connecticut State Government*, https://ballotpedia.org/Party_control_of_Connecticut_state_government (last visited Mar. 28, 2026).

²⁴ Rick Rojas, *Connecticut Adopts a Budget After Months of Debate and Delays*, N.Y. TIMES (Oct. 31, 2017), <https://www.nytimes.com/2017/10/31/nyregion/connecticut-budget.html>.

²⁵ Keith M. Phaneuf, *Report: CT Has Slashed Deeply into Hefty Pension Debt*, CT MIRROR (Aug. 29, 2025, 9:28 AM), <https://ctmirror.org/2025/08/29/ct-pension-debt-pew-report/>.

²⁶ CONNECTICUT'S STATE UNIT ON AGING, DEP'T OF AGING AND DISABILITY SERVS., CONNECTICUT'S STATE PLAN ON AGING: BUILDING BRIDGES AND CREATING CONNECTIONS 14 (2020), <https://portal.ct.gov/-/media/aginganddisability/aging-services/state-plans/2021-2023-ct-state-plan-on-aging.pdf> ("Connecticut continues to grow older while the working age population stays fairly constant.")

²⁷ Dustin Chambers & Patrick McLaughlin, *Connecticut's Regulatory Landscape: Federal and State Rules and Some of Their Unintended Consequences*, MERCATUS CTR. (AUG. 6, 2024), <https://www.mercatus.org/regsnapshots24/connecticut>.

on consultants, who generally increase costs.²⁸ In the context of infrastructure, adding one employee to a state Department of Transportation for every thousand people in that state reduces costs by an estimated 26%.²⁹ Unsurprisingly, higher quality employees also reduce costs.³⁰ And experienced employees pay for themselves: experienced engineers save states roughly six times more than it costs to employ them.³¹

Unfortunately, Connecticut exemplifies the costs that arise from insufficient state capacity and lack of personnel. Take Connecticut's Department of Transportation (DOT) as an example. In 2023, DOT had about 500 vacancies; put another way, DOT was operating without 14% of its statutorily-authorized workforce.³² That same year, it estimated that a quarter-mile-long bridge over the Housatonic River would cost \$2.2 billion in funding to replace.³³ The following year, when New Haven wanted to install traffic cameras at 19 intersections, it took over ten months for DOT to review and approve the plan.³⁴ And in 2025, after discovering a 3-foot-wide, 7-foot deep sinkhole in Stratford, it took nearly two months to begin construction,³⁵

²⁸ Zachary Liscow, Cailin Slattery, and William Nober, *State Capacity and Infrastructure Costs*, YALE L. & ECONS. RSCH. PAPER Aug. 23, 2025, at 17 ("80% of respondents [including contractors and DOT officials] report that using consultants increases costs at least moderately.").

²⁹ *Id.* at 18.

³⁰ *Id.* at 28 ("A one standard deviation increase in the quality of the Project Head is associated with a 11% decrease in cost per mile."); *id.* at 29 ("[H]igh-quality Construction Heads help reduce overruns by about 10-11%.")

³¹ *Id.* at 36.

³² Ken Dixon, *After Wave of Retirements Last Year, CT Department of Transportation is Down by About 500 Employees*, CT INSIDER (MAR. 29, 2023, 3:28 PM), <https://www.ctinsider.com/politics/article/ct-department-transportation-down-500-employees-17866898.php>.

³³ John Moritz, *A \$1 Billion Bridge. The \$300 Million Pier. Why Are Project Construction Costs in CT So High?*, CT INSIDER (Nov. 19, 2023 5:49 AM), <https://www.ctinsider.com/connecticut/article/ct-billion-dollar-bridges-infrastructure-amtrak-18456623.php>.

³⁴ Thomas Breen, *State Approves 15 of 19 Traffic Cameras in New Haven*, CT MIRROR (Oct. 22, 2025, 10:15 AM), <https://ctmirror.org/2025/10/22/new-haven-traffic-cameras-ct/>.

³⁵ Amanda Pitts, *Repairs Begin on Stratford Road Closed after June Sinkhole*, NBC CT (July 22, 2025, 5:40 PM), <https://www.nbcconnecticut.com/news/local/repairs-begin-on-stratford-road-closed-after-june-sinkhole/3612958/>.

and over four months to complete it.³⁶ These inefficiencies are not new; a project to remove two traffic signals from Route 9 has been ongoing since 2003, and it is optimistically estimated to be completed in 2032, despite a crash occurring near the intersection “every other day.”³⁷

DOT’s inefficiencies cannot be linked definitively to lack of personnel, and other factors also contributed, including coordination and permitting issues. These are important problems. But personnel can help mitigate those problems by promoting effective coordination with other stakeholders, review and completion of permitting requirements, and oversight of contractors and consultants. Without effective workers, DOT cannot be expected to perform more effectively. And without efficient hiring practices, DOT cannot hope to employ those effective workers in the first place.

In other words, hiring more and better workers would reduce costs for the state of Connecticut—just as hiring more and better workers would reduce costs for state and local governments across the board. But Connecticut cannot hire those workers, in part because it takes so long to find and onboard willing candidates. By changing the process, the state can generate a positive feedback loop for itself. By reducing the time to hire for an agency and increasing agency discretion, agencies free up immediate resources that would have been tied up in hiring and becomes more likely to find high-quality employees before those employees are recruited by the private sector. This then creates better-managed projects, conserving even more future resources—resources that can be re-invested into finding and retaining top talent, further reducing costs.

³⁶ Richard Chumney, *Route 113 in Stratford Reopened after DOT Crews Repair Sinkhole, Mayor Says*, CT INSIDER (Oct. 10, 2025), <https://www.ctinsider.com/news/article/route-113-stratford-ct-repair-sinkhole-21095317.php>.

³⁷ Mary Ellen Godin, *CT DOT Pushes Back Middletown Route 9 Signal Project Timeline, with End Date Set for 2032*, CT INSIDER (Oct. 4, 2025, 9:54 AM), <https://www.ctinsider.com/news/article/middletown-route-9-traffic-signal-project-delays-21075560.php>.

III. Time to Hire

Prior to 2023, Connecticut did not track hiring timelines consistently. Hiring experiences before then are primarily based on anecdotal evidence, though these anecdotes are supported by a Boston Consulting Group report in 2021 finding that it took “at least 5-6 months to complete the process” (and in some cases 7-8 months).³⁸ Starting in 2023, however, the state began tracking median times to hire for each agency. The availability of this data—a rarity for state governments—demonstrates that DAS is concerned about its hiring timelines already. It also makes it possible to roughly quantify the extent to which hiring timelines remain a problem. As the data demonstrates, speed remains a problem everywhere—but it is a much bigger problem in the non-centralized, agency-directed stages of the process.

As a broad overview, there are five main stages to the agency hiring process.³⁹ DAS tracks the median number of days it takes to move through each of those five stages.⁴⁰ The first phase is the agency’s internal decision that it needs to fill a position. This stage formally begins when a hiring manager makes a request to fill a position and ends when the agency sends the request to OPM for approval. The second stage ends when OPM approves the request to hire. Stage three covers the agency’s review of compliance with SRCBAs and coordination with DAS to actually post the position. Stage four begins with this posting, and it ends once the agency receives a candidate list created by DAS that complies with SRCBAs and the agency’s own requests. Finally, stage five ends when a candidate actually starts working at an agency and includes the agency’s selection of a candidate, justification through Affirmative Action

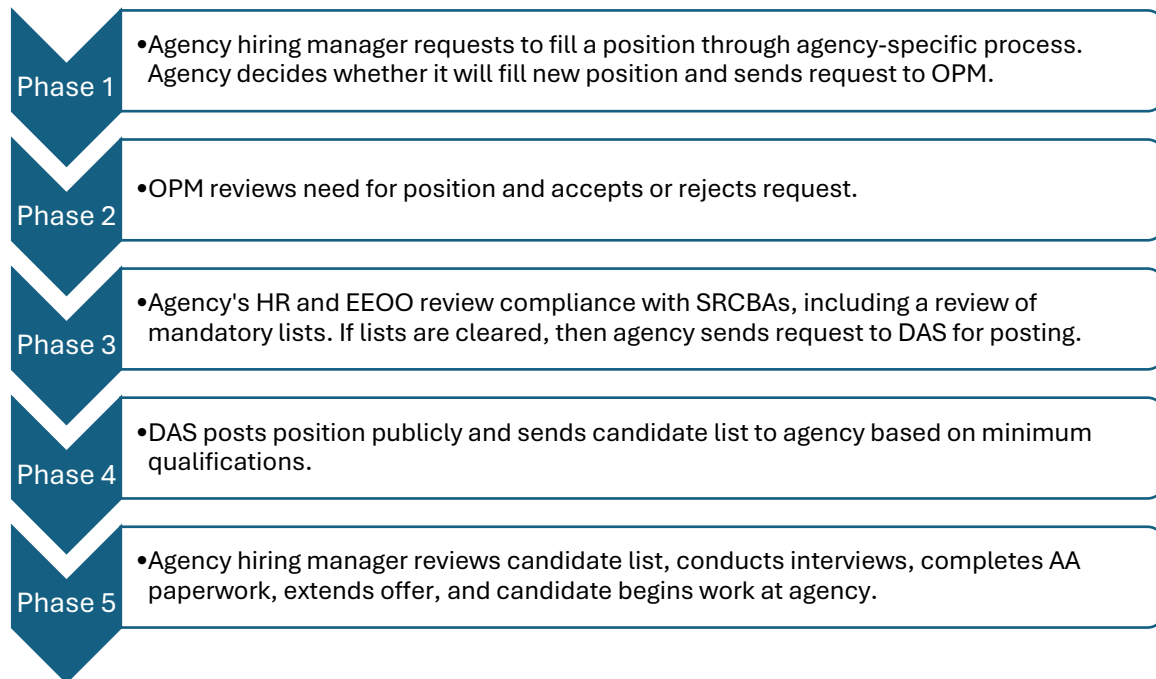
³⁸ BOSTON CONSULTING GRP., *supra* note 5, at 20.

³⁹ Since collecting initial data points for this paper, DAS has changed the presentation of their dataset. DAS now breaks it into four main stages: recruitment plan, job opening, applicant screening, and agency selection. However, these four main stages only apply to data collected after March 2026. Therefore, DAS’s previous five-stage breakdown is utilized for the datapoints referenced in this Part.

⁴⁰ *Time to Fill State Positions: “About Data”*, CT DATA (Mar. 20, 2026, 10:30 AM), https://data.ct.gov/Government/Time-to-Fill-State-Positions/nkww-d5z2/about_data.

processes, and compliance with the requirements found in SRCBAs. Figure 1 provides a summary of this process.

Figure 1 – Phases of Hiring Process



Although DAS tracks this data, it is important to note that there is some noise in the results. According to a DAS official familiar with the database, the site where the data is compiled is still under construction; while the raw data is there, “it is tricky to align it all on a timeline that makes sense.”⁴¹ This is no doubt due to the complexity of the process and the fact that the process could restart at an earlier stage if an unwanted result occurs. As a result, the data from one month of one agency’s hiring practices may not be reliable enough to form specific

⁴¹ Zoom Interview with Anonymous, *supra* note 7. Indeed, the site is constantly updating. As of March 29, 2026, all data prior to March 2026 is no longer viewable without exporting data from the changelog.

conclusions. Nevertheless, the broad trends are clear, and those trends align with the anecdotal evidence from those experienced in the system and evidence from other sources.

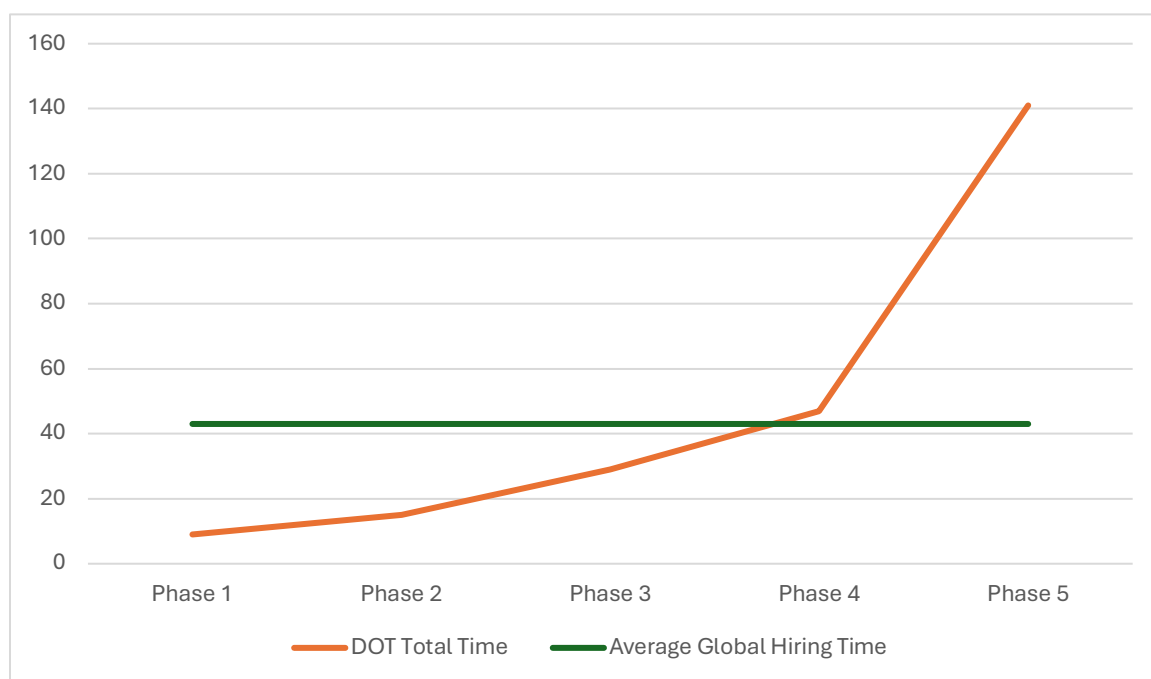
Let us begin with an example of a relatively speedy set of data in agency hiring, using DOT as an example. Figure 2 provides a visual representation of this month’s set of data, with the orange line tracking the median number of days DOT took to complete each phase of the hiring process. In August 2023, it took 9 days for DOT to request a hire, 6 days for OPM to approve the request, 14 days for DOT to review compliance, 18 days for DAS to establish a candidate list, and 94 days for DOT to interview, select, and onboard a new hire.⁴² In other words, 67% of the process—over three months—consisted of DOT actually selecting a candidate to hire.

That same year, a report by HR professionals on the state of public and private hiring worriedly stated that, “despite the best efforts of employers . . . an already stretched recruitment process [increased] to 43 days on average” across global industries.⁴³ In Figure 2, that average is represented by the green line. To be sure, 43 days is a long time for a position to remain unfilled in any organization, but those 43 days include the entire process, from deciding to fill a position to onboarding a new candidate. Unfortunately, DOT took longer than 43 days before it even got to the interview stage. As Figure 2 shows, DOT required a median of 47 days to establish candidate lists in August 2023. And then the interview process took another three months.

⁴² *Time to Fill State Positions*, CT DATA (Mar. 20, 2026, 10:30 AM), https://data.ct.gov/Government/Time-to-Fill-State-Positions/nkww-d5z2/data_preview.

⁴³ *New Research Shows That Hiring Is Harder Than Ever: Time to Hire Increasing Significantly for Almost All Roles*, AMS (June 1, 2023), <https://www.weareams.com/news/new-research-shows-that-hiring-is-harder-than-ever-time-to-hire-increasing-significantly-for-almost-all-roles/#>. Unfortunately, the underlying study is exclusively available to Josh Bersin Company members.

**Figure 2 – DOT Median Hiring Times in Days vs. Average Global Hiring Time
(August 2023)**



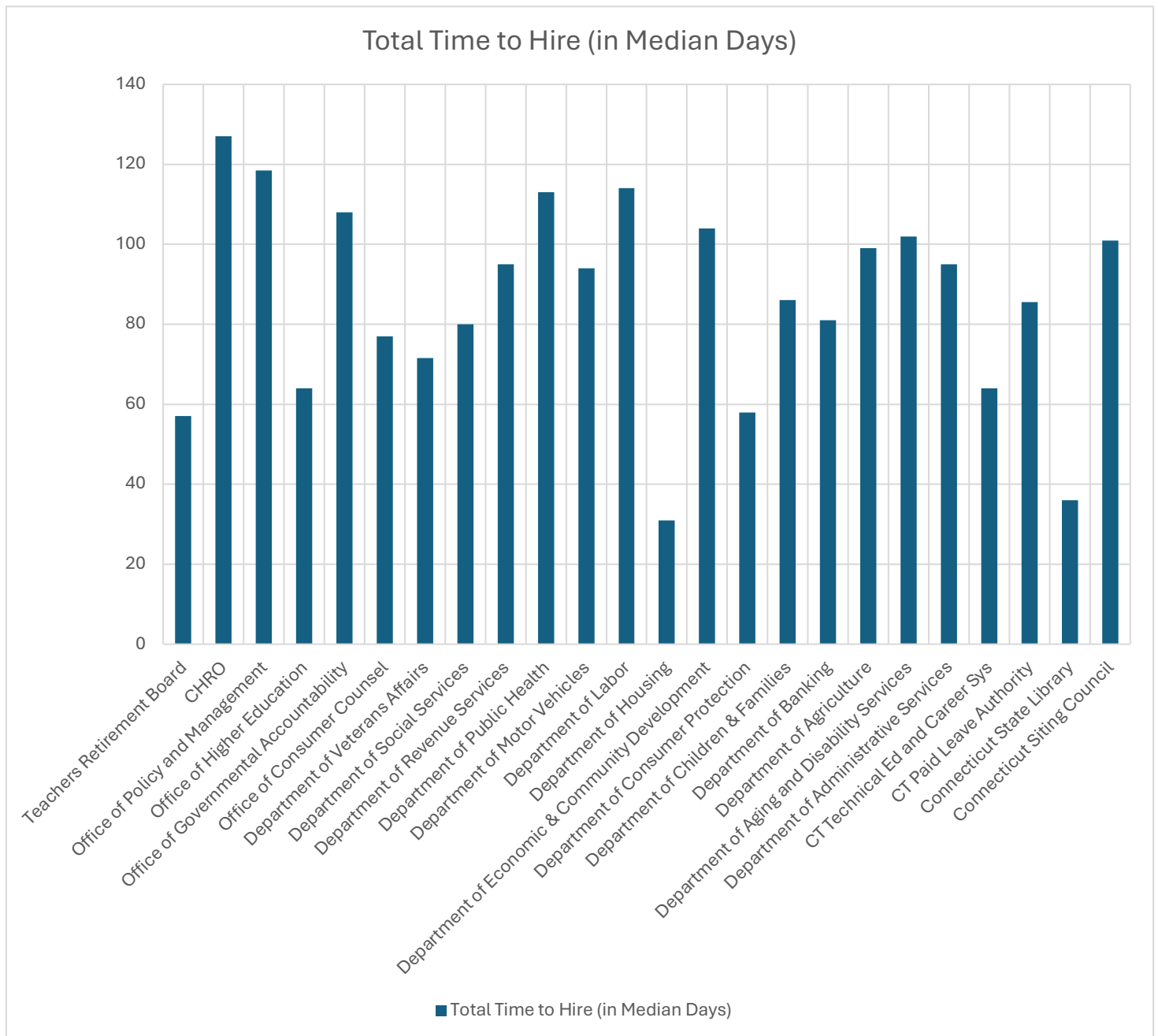
Again, there is fuzziness in these numbers. For instance, in January 2026, DOT reported a median time of 91 days to complete the entire process, but the next month that number jumped to 141.5.⁴⁴ Month-to-month, it is difficult to tell which number is more accurate for most positions. But at no point since the start of data collection has DOT reported a time comparable to the “stretched” 43-day average. The same is true for nearly every other agency, and other agencies often report much worse median times. Figure 3 provides total time to hire for each agency in March 2026; as shown, only two agencies reported times under 43 days.⁴⁵ Even using extremely

⁴⁴ *Time to Fill State Positions*, *supra* note 40.

⁴⁵ *Id.*

rough numbers, and giving the benefit of the doubt to agencies because of that roughness, it is clear that agencies regularly take at least twice as long to hire as the global average—and sometimes much, much longer.

Figure 3 – Total Time to Hire by Agency



Other broad conclusions can be drawn from this rough data. Agency medians may fluctuate, but OPM and DAS are strikingly consistent in their timelines. Sticking with DOT's dataset, from August 2023 to March 2026, OPM has never taken more than 8 days to approve a position, and it has been as fast as 3 days in September 2025. Even as DAS always takes longer to create a candidate list, its median time was never longer than 21 days, and for a full year (from April 2024 to April 2025) its median time was a consistent 15 days.⁴⁶ Expanding to the state-wide trends, while there are occasional spikes,⁴⁷ for the most part OPM hovers around one week and DAS around 2-4 weeks.⁴⁸ Even from this incomplete database, OPM and DAS appear to be highly structured and relatively efficient actors within the hiring process; although OPM and DAS collectively require about a month to complete their respective tasks, it is predictably one month.

The same cannot be said for agency contributions to the hiring process. The data simply are not consistent within or between agencies. For instance, DOT's interview and selection process is fairly consistent, always taking 1-3 months (from 23.5 to 97 days).⁴⁹ On the other hand, its internal review of mandatory lists and compliance varies dramatically, starting with 14 days in August 2023, rising fairly constantly over time to 346 days in March and April 2025, and then diving down suddenly to 7 days in August 2025.⁵⁰ Compare these trends to those of DSS. In August 2023, its median time for review of mandatory lists and compliance was 74 days, and its median time for interviews and selection was 96.5 days—relatively even.⁵¹ Starting around May

⁴⁶ *Id.*

⁴⁷ *Id.* (such as OPM's median time of 61.5 days for the Department of Public Health in November 2025).

⁴⁸ *Id.*

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ *Id.*

2024, the median times for the former start rising right as times for the latter start falling, both at a fairly steady pace. In November 2025, the medians sat at 1,008 days and 1 day, respectively.⁵²

These wild swings in data may not point to any one thing, and they may be a result of DAS attributing different pieces of the process to different phases over time as agency analysts sort through this data. But the disparity between the centralized processes and the decentralized agencies does indicate something. It indicates that there is a lack of consistency in agency practices around hiring, resulting in dramatically different timelines between hiring managers in the same agency and between hiring managers in different agencies. It indicates a lack of predictability as to which parts of the process will slow a particular hiring action. And it indicates that the main problems occur within agencies, even as the specific reasons within an agency may differ. Indeed, one DAS official agrees with these broad conclusions: “aside from the exact numbers, the general understanding is that the latter stages of the process take a long time.”⁵³ But the data do not indicate why. For that, we have to turn to the SRCBAs.

IV. The SRCBAs

Connecticut’s hiring practices are governed directly by Titles 4 and 5 of the Connecticut General Statutes, Title 5 of the Regulations of Connecticut State Agencies, and seventeen collective bargaining agreements with state employees. In addition, portions of Chapter 814c of the Connecticut General Statutes and Title 46a of the Regulations introduce CHRO into the process through review of agency hiring practices. Most of the practices outright required by these SRCBAs are broadly permissive, granting latitude to hiring managers to hire whoever is most qualified and, within certain limits, in the ways hiring managers find most efficient.

⁵² *Id.*

⁵³ Zoom Interview with Anonymous, *supra* note 7.

However, two areas require practices that are both time-consuming and confusing, creating opportunities for inefficiencies that result from miscommunication or custom in addition to those that result directly from the statutes.

This Part is organized into three subparts. The first covers the statutes and regulations that directly govern the hiring process. The second covers the additional requirements imposed as a result of collective bargaining agreements. The third provides an overview of CHRO's role in reviewing these practices through affirmative action plans.

A. Statutory and Regulatory Requirements

1. Statutes

The Connecticut General Statutes provide the starting point for agency hiring requirements. Title 4 provides only a few provisions: one mandating that the Commissioner of Administrative Services determine salaries that are not already dictated by law,⁵⁴ one requiring that competitive tests accommodate disabilities,⁵⁵ and another requiring agencies to give preference to foster children when selecting interns.⁵⁶

Title 5 provides the majority of the hiring process, all located in Chapter 67, which codifies the State Personnel Act. The Chapter begins with a clear endorsement of efficiency and a focus on effective employees, directing administrators (and, seemingly, judges) to interpret the entire Chapter with those principles in mind:

This chapter shall be so construed and administered as to provide a uniform and equitable system of personnel administration of employees in the state service. Recruitment, selection, [and] appointment . . . shall be performed in a manner to secure and retain well qualified employees to carry out state programs effectively

⁵⁴ CONN. GEN. STAT. § 4-40 (2025).

⁵⁵ CONN. GEN. STAT. § 6-61nn (2025).

⁵⁶ CONN. GEN. STAT. § 6-6100 (2025).

and efficiently and to provide reasonable stability of employment in the state service.⁵⁷

The next section continues the sentiment, explicitly stating that merit is to be the guiding principle:

The system of personnel administration for employees in the state service shall be based on merit principles. All appointments and promotions, except as hereinafter specified, shall be made according to merit and fitness as ascertained by examinations given in accordance with provisions of this chapter.⁵⁸

As noted here, there are positions exempt from these guiding principles—quite a few, in fact.

Probably the largest class of exempt positions includes “all officers and employees of the Division of Criminal Justice.”⁵⁹ Most exempted positions, though, are filled by just a handful of people, and the vast majority of state employees are not exempt from merit principles.⁶⁰

As noted above, DAS is responsible for the processes used to hire personnel, even as agencies are ultimately responsible for the decisions made within this process. In doing so, DAS is statutorily required to plan ahead, including by projecting how many employees an agency is expected to need in the next five years and whether and how much hiring is required.⁶¹

Interestingly, DAS is also required to consider how to “improv[e] the image of state employment and state employees as perceived by the residents of this state, potential candidates for state employment and state employees.”⁶²

⁵⁷ CONN. GEN. STAT. § 5-194 (2025).

⁵⁸ CONN. GEN. STAT. § 5-195 (2025).

⁵⁹ CONN. GEN. STAT. § 5-195(21) (2025).

⁶⁰ CONN. GEN. STAT. § 5-195 (2025) (listing exempt positions, including “all agency heads,” “The State Historian,” and “forest fire wardens”).

⁶¹ CONN. GEN. STAT. § 5-199c (2025).

⁶² *Id.* Though not immediately relevant to hiring timelines, this is an interesting directive for the legislature to give DAS. DAS does not appear to give this Section much weight; however, insofar as the hiring process currently impairs the image of state employment, this Section could be a hook for future reform.

DAS also operates the actual mechanics of hiring: identifying qualified applicants and establishing candidate lists.⁶³ However, DAS can “fully or partially” delegate these tasks to the agencies themselves “in order to improve human resource management.”⁶⁴ The only requirement is that these agencies be “subject to audit,” presumably by DAS itself.⁶⁵ Thus, DAS has broad discretion to determine how centralized the hiring process is, subject to little in the way of statutory limitations.⁶⁶

Selection of candidates also appears to be broadly discretionary. Results from competitive examination, “including application rejection,” are not appealable to the Employees’ Review Board.⁶⁷ While OPM does have authority over whether hiring will take place, their authority stops after that decision has been made.⁶⁸ As of 2023, the hiring agency alone chooses “any candidate on the candidate list that is determined to be the most qualified and suitable for such position,” subject to no other (direct) review, and it can use a new candidate list or “any candidate list that is in the same or comparable class.”⁶⁹ These candidates do not have to live in Connecticut unless DAS explicitly states that residency is required for certain positions.⁷⁰ Furthermore, the agency can *immediately* hire a candidate if the agency thinks doing so is required to “maintain operational efficiency and productivity.”⁷¹ If it does, any employee-specific requirements that would usually be checked prior to employment can instead be verified

⁶³ CONN. GEN. STAT. § 5-200(a) (2025).

⁶⁴ *Id.*

⁶⁵ *Id.*

⁶⁶ *See also id.* (“The Commissioner of Administrative Services or his authorized agent shall administer centralized and decentralized selection programs . . .”) (emphasis added).

⁶⁷ CONN. GEN. STAT. § 5-202(g) (2025).

⁶⁸ *See* CONN. GEN. STAT. § 5-214 (2025) (requiring OPM, or DAS as delegee, to certify new positions and the filling of vacancies as “necessary for carrying on the work of the state in an efficient and business-like manner”); CONN. GEN. STAT. § 5-215 (2025) (allowing OPM to cancel unneeded, unfilled positions).

⁶⁹ CONN. GEN. STAT. § 5-215a (2025).

⁷⁰ CONN. GEN. STAT. § 5-231 (2025).

⁷¹ CONN. GEN. STAT. § 5-215a (2025).

or completed during the new hire’s working test period.⁷² And agencies don’t have to wait if a hiring manager already knows who they want to hire; the agency can begin screening candidates as soon as the job has been posted.⁷³

Similar flexibility is afforded to DAS in administering competitive examinations. First, some competitive positions can be excluded from examination or examined promptly and without public notice: skilled and semiskilled labor,⁷⁴ positions which require professional degrees,⁷⁵ and any position where it is difficult to find candidates, among others.⁷⁶ When examinations are required, they can be held continuously, avoiding inconsistent or inconvenient examination dates.⁷⁷ Once established, regular candidate lists can remain in place for over three years, and continuous recruitment lists can remain for even longer.⁷⁸

Section 5-219, which governs the substance of examinations, continues to afford discretion to DAS over the format of examinations, although it must cooperate with the hiring agency to create them.⁷⁹ Examinations must only “relate to such matters as will fairly test and determine the qualifications, fitness and ability of the persons tested.”⁸⁰ The Section provides a non-exhaustive list of examples (“written or oral tests, demonstration of skill or physical ability, [or] experience and training evaluation”), but “any other assessment device or technique deemed appropriate” is also permitted.⁸¹ Other typical requirements, including educational requirements

⁷² *Id.*

⁷³ CONN. GEN. STAT. § 5-215b (2025).

⁷⁴ CONN. GEN. STAT. § 5-233 (2025).

⁷⁵ CONN. GEN. STAT. § 5-227b (2025).

⁷⁶ *See e.g., id.* (allowing waiver of examination when the number of candidates who meet minimum qualifications are five or less); CONN. GEN. STAT. § 5-233 (2025) (allowing Commissioner of DAS to register candidates “where the character of the work, or the place of work, makes it impracticable to secure at stated times a sufficient number of applicants to supply the needs of the service”).

⁷⁷ CONN. GEN. STAT. § 5-216(a) (2025).

⁷⁸ CONN. GEN. STAT. § 5-217 (2025).

⁷⁹ CONN. GEN. STAT. § 5-219(a) (2025).

⁸⁰ *Id.*

⁸¹ *Id.*

or professional licensing, are also optional and discretionary, and professional licensures or degrees can replace examinations altogether if those credentials are mandatory requirements of a job posting.⁸²

Chapter 67 does provide limited controls on hiring by allowing applicants who are found unqualified to appeal their rejection to DAS,⁸³ as well as by allowing applicants to appeal the accuracy of their scores.⁸⁴ However, neither Section requires DAS or the agency to pause the hiring process while these appeals are pending. Furthermore, while some veterans and their spouses receive a boost to their final ratings,⁸⁵ the discretion afforded to agencies under Section 5-215a to choose the most qualified applicant places the value of these ratings in question. After all, the agency is not required to pick the candidate with the highest rating.

In short, the above statutory scheme is highly flexible. Most restrictions that pose problems for other states' hiring practices are either rejected outright or waivable according to relatively unguided discretion (e.g., residency requirements, antiquated civil service examinations, holding positions open for a certain amount of time before interviewing).

More concerning is the language in Section 5-228, which states that vacancies should be filled, "so far as possible and for the best interest of the state," by promotions, transfers, or reemployment.⁸⁶ Transfers and reemployment especially constrain agency discretion in hiring; Section 5-241 mandates that agencies transfer laid-off employees to similar vacancies in other departments or agencies.⁸⁷ If there are no vacancies, or the employee refuses, then the employee is placed on a reemployment list for some period of time—and agencies must rehire from

⁸² *Id.*

⁸³ CONN. GEN. STAT. § 5-221a (2025).

⁸⁴ CONN. GEN. STAT. § 5-225 (2025).

⁸⁵ CONN. GEN. STAT. § 5-224 (2025).

⁸⁶ CONN. GEN. STAT. § 5-228(a) (2025).

⁸⁷ CONN. GEN. STAT. § 5-241(b) (2025).

reemployment lists in reverse order of layoffs.⁸⁸ Still, there is an escape clause, of sorts, in Section 5-228: the agency can get permission from DAS to hire a new candidate if it is not possible to hire by promotion, transfer, or reemployment.⁸⁹ However, there are no criteria defining possibility within the statutes.

With the exception of a few sections governing unconventional situations, Chapter 67 has no more to say about agency hiring practices.⁹⁰ Throughout, state agencies are afforded broad discretion to determine who, when, and how they hire new candidates. The only limitations discernable in the statutes themselves are potential coordination issues with OPM and DAS and the endorsement of internal and cross-agency hiring. However, both OPM and DAS are executive agencies whose policies should be easily changeable, if there is political will to do so. Furthermore, the statutes do not themselves clarify whether hiring managers must *hire* from mandatory lists or simply *review* mandatory lists before making a discretionary hiring decision. For that, we must turn to the regulations.

2. *Regulations*

The regulations governing agency hiring are surprisingly sparse. For the most part, they define processes that are referenced in the Connecticut General Statutes, such as detailing how transfers and reemployment lists operate.⁹¹ However, one regulation substantially impacts the hiring process by mandating the order in which candidates can be hired to permanent positions. The regulation makes clear that laid-off employees who are eligible and qualified *must* be

⁸⁸ *Id.*

⁸⁹ CONN. GEN. STAT. § 5-228(a) (2025).

⁹⁰ For instance, Sections 5-226f and 235 provide opportunities for agencies to try out pilot programs for examinations or request and receive provisional, temporary, emergency, or intermittent positions. *See* CONN. GEN. STAT. § 5-226f (2025); CONN. GEN. STAT. § 5-235 (2025).

⁹¹ CONN. AGENCIES REGS. § 5-239-1 (2026); CONN. AGENCIES REGS. § 5-241-1 (2026).

offered employment first.⁹² Once the agency has exhausted the reemployment list, they turn to internal promotion, cross-agency promotion, or a new hire, in that exact order, “insofar as practicable.”⁹³

This language is a major driver in agencies’ inability to hire quickly or effectively. As Mr. Geballe stated when discussing hiring prior to 2023, agencies would start the process over to not get candidates that came out of mandatory lists.⁹⁴ While this problem may have been somewhat mitigated by changes to the statutes in that year, the regulations mandating a hiring order have not been amended since 1984. A current DAS official confirmed that “transfers and rehiring lists are incredibly real.”⁹⁵ Their effect is also amplified by the regulations requiring promotions and transfers before new hires. Once one position is filled by a transfer (or promotion), that leaves another position open that was once filled by the transferee. *That* position now must go through the hiring process, beginning with the mandatory lists. If *that* position is filled by a transfer, then there is another position that needs filling—and so on. In some instances, the mandatory lists create a cascading effect that can replicate the original hiring problem multiple times as a result of one initial vacancy.

Of course, candidates still must be minimally qualified, and not all employees who lose their job are eligible for positions.⁹⁶ But even reviewing the mandatory lists takes time. As one DAS official stated, “any time an agency has a vacancy, they have to review all these databases of current and former employees that have certain rights to jobs. The databases and rights are many, and it takes time to exhaust all possibilities.”⁹⁷ And because the regulations only specify

⁹² CONN. AGENCIES. REGS. § 5-228-1(b) (2026).

⁹³ CONN. AGENCIES. REGS. § 5-228-1(a) (2026).

⁹⁴ Interview with Josh Geballe, *supra* note 4.

⁹⁵ Zoom Interview with Anonymous, *supra* note 7.

⁹⁶ See CONN. AGENCIES REGS. § 5-241-2(b) (2026) (defining “layoff” as excluding disability, delinquency, incompetence, misconduct or neglect of duty”).

⁹⁷ Zoom Interview with Anonymous, *supra* note 7.

that candidates must be “qualified,” the lists might produce a candidate who meets minimum qualifications without satisfying any preferred qualifications. The agency may then be forced to make a difficult choice: hire the minimally qualified candidate immediately, or restart the process and revise the minimum qualifications so that the agency can instead find a candidate who also satisfies preferred qualifications. Thus, the mandatory lists considerably slow the process at the same time as they hinder the production of a viable candidate. If the lists do not produce a minimally qualified candidate, then the agency hiring manager has wasted time going through lists to confirm what was already obvious: that the position requires an external candidate. If the lists do produce a minimally qualified candidate, then the hiring manager is stuck with a limited pool, which may include minimally qualified candidates that are simply not *as qualified* as a candidate from the public. In short, the mandatory lists promote neither efficiency nor the best result for the state.

B. Collective Bargaining Agreements

The mandatory lists’ persistence is explained by the state’s relationships with unions, who have negotiated further protections for the lists. In addition to the above statutes and regulations, the state’s hiring process is also governed in part by seventeen collective bargaining agreements (CBAs).⁹⁸ The CBAs are classified according to the union which negotiated the agreement, and therefore each CBA governs a different job class, not a different agency. This means that different employees and vacancies within the same agency will be governed by

⁹⁸ Unfortunately, the state’s website collecting and publishing the collective bargaining agreements is slightly outdated, containing several agreements that expired in 2024 or 2025. However, these agreements appear to be the most recent publicly available agreements. *See Office of Labor Relations Contracts*, OFF. OF POL’Y & MGMT., <https://portal.ct.gov/opm/olr-publications/contracts/office-of-labor-relations-contracts> (last accessed Mar. 29, 2026).

slightly different rules, while the same kind of job between two agencies will be subject to the same rules.

For instance, the Department of Correction (DOC) employs people for a variety of roles, ranging from medical providers to custodians to HVAC technicians to correctional officers. DOC must therefore be familiar with *at least* four CBAs (and really more like seven) and consult one over another based on the position. Specifically, those involved with hiring at DOC must know the CBAs for maintenance workers, correctional officers, administrative clerical workers, paraprofessional healthcare workers, professional healthcare workers, correctional *supervisors*, educational professionals, and so on. Meanwhile, a maintenance worker hired by DOC is under the same CBA as a maintenance worker hired DOT, and therefore subject to the same reemployment and transfer rules.

One can imagine this situation producing both difficulty and confusion. For instance, imagine that a DOC maintenance worker is laid off and placed on a reemployment list. The DOC worker was not laid off for disciplinary reasons or incompetence, but they were also not the most effective employee, and if given the choice DOC would not have hired them again. Then, six months later, a DOT worker retires. When filling the retired worker's position, DOT would be required to offer the job to the DOC worker, despite the fact that better candidates exist and despite the fact that the work location and environment would be completely different. Now, perhaps maintenance workers have easily transferrable skills, and perhaps not much rides on their abilities (though ask anyone working in an office with a broken bathroom or HVAC whether slow maintenance matters). But the same is true for many other job titles. Educators might work for DOC, the Department of Developmental Services, or even the Department of Aging and Disability Services. These agencies serve wildly different constituencies, and an

educator that is successful in one area cannot automatically be expected to succeed in another area. Nevertheless, the Department of Aging and Disability Services might be *required* to hire an educator from DOC if the minimum qualifications are not sufficiently specific—something that is difficult to predict in advance. The same is true for a myriad of other kinds of positions; IT professionals, administrative workers, and human services providers are obvious examples.

Of course, agencies have ways to avoid hiring a minimally qualified candidate: restart or wait until the mandatory lists expire. Either adds significant time. At the very least, restarting requires the hiring manager to develop new criteria and review the mandatory lists a second time under the new criteria. While this may mean the agency has a better result in the end, it forces the agency to spend unnecessary time to achieve that result—time that could have been spent interviewing and then training a more effective worker, and time that the hiring manager has to spend not doing their *actual* job.

The above difficulties are only exacerbated by the subtle variations between CBAs as to how mandatory lists operate. In other words, agencies do not only need to be familiar with one set of rules. Agencies need to know that the police have different transfer rules from maintenance workers, who have different transfer rules from administrative managers, and agencies also need to employ the appropriate procedures for each relevant vacancy. Although there are certain common provisions, no provision is universal to every CBA, and even similar provisions often require slightly different procedures. A few common examples follow:

- Requiring vacancies to be filled with reemployment lists before any source outside of state service;⁹⁹

⁹⁹ E.g., *Contract between State of Connecticut and American Federation of State, County, and Municipal Employees, AFL-CIO Locals 196, 318, 478, 610 and 704 of Council 4, Administrative Clerical (NP-3) Bargaining Unit: July 1, 2021 to June 30, 2025* at 32, <https://portal.ct.gov/-/media/opm/olr/contracts/np-3-contract-with-pay-scales-included.pdf?rev=345668c25f0d4f9b920196f2d8a49315&hash=8DB348F09070F3D67CD3210DB0ACA8FC>; *Education Professions (P-3B) Contract between State of Connecticut and Connecticut State Employees Association SEIU Local 2001: July 1, 2016 to June 30, 2021* at 26, <https://portal.ct.gov/->

- Required posting of vacancies within job sites for a specified period of time prior to hiring (usually around a week);¹⁰⁰
- Written explanations upon request when a transfer candidate is found to be unqualified;¹⁰¹
- Possibility for union grievances if there is an unreasonable pattern of transfer denials;¹⁰²
- Requirements to maintain transfer lists for a period of time after requests are filed (sometimes within one agency, sometimes centrally and across agencies);¹⁰³
- Requirements to periodically provide to the union copies of reemployment lists and all appointments made (e.g., once a month);¹⁰⁴

/media/opm/olr/contracts/p-3b-contract-2016-2021-web.pdf?rev=90d2c8a519b845a6847984bfef38765b&hash=1BAC6240889D191F167D4A3EE4D21CC8; *Contract between State of Connecticut and New England Health Care Employees Union District 1199, Professional Health Care Employees Bargaining Unit (P-1) Contract and Paraprofessional Health Care Employees Bargaining Unit (NP-6) Contract: July 1, 2021 to June 30, 2025* at 32, <https://portal.ct.gov/-/media/opm/olr/contracts/1199-2021-2025-state-employees-contract.pdf?rev=5a67cb2d84e44e089a9eacf789ed11b9&hash=E734325992B85FF96AC711C55207CFB1>.

¹⁰⁰ E.g., *Maintenance & Service Unit (NP-2) Contract between State of Connecticut and Connecticut Employees Union Independent: July 1, 2021 to June 30, 2025* at 25, <https://portal.ct.gov/-/media/opm/olr/contracts/np2-final-contract-2125.pdf?rev=18290e4a0d124b5d8f7b6a92c2336d15&hash=14039C08F33402177336C248A77866DE>; *Contract between State of Connecticut and American Federation of State, County, and Municipal Employees, AFL-CIO Locals 196, 318, 478, 610 and 704 of Council 4, Administrative Clerical (NP-3) Bargaining Unit: July 1, 2021 to June 30, 2025*, *supra* note 97, at 60; *Education Professions (P-3B) Contract between State of Connecticut and Connecticut State Employees Association SEIU Local 2001: July 1, 2016 to June 30, 2021*, *supra* note 97, at 26; *Contract between State of Connecticut and New England Health Care Employees Union District 1199, Professional Health Care Employees Bargaining Unit (P-1) Contract and Paraprofessional Health Care Employees Bargaining Unit (NP-6) Contract: July 1, 2021 to June 30, 2025*, *supra* note 97, at 19.

¹⁰¹ E.g., *Maintenance & Service Unit (NP-2) Contract between State of Connecticut and Connecticut Employees Union Independent: July 1, 2021 to June 30, 2025*, *supra* note 98, at 26; *Contract between State of Connecticut and American Federation of State, County, and Municipal Employees, Social and Human Services (P-2) Bargaining Unit: July 1, 2021 to June 30, 2025* at 35, <https://portal.ct.gov/-/media/opm/olr/contracts/p-2-2022-2025.pdf?rev=0a910e3340cc4bdcaec75cb77f60fc3d&hash=86D666F62077542FE3515F13297EEB63>; *Collective Bargaining Agreement between State of Connecticut and AFSCME Council 4, Local 3419, DCF Program Supervisors(P-8): July 1, 2021 to June 30, 2024* at 18, <https://portal.ct.gov/-/media/opm/olr/contracts/p8-cba--20212024-finalsigned.pdf?rev=aa093ac8a99f4c8da6ccda891c4b16c6&hash=03C095E641FD1DD8782BF78B596938D4>.

¹⁰² E.g., *Contract between State of Connecticut and American Federation of State, County, and Municipal Employees, Social and Human Services (P-2) Bargaining Unit: July 1, 2021 to June 30, 2025*, *supra* note 99, at 35; *Collective Bargaining Agreement between State of Connecticut and AFSCME Council 4, Local 3419, DCF Program Supervisors(P-8): July 1, 2021 to June 30, 2024*, *supra* note 99, at 18.

¹⁰³ E.g., *Contract between State of Connecticut and American Federation of State, County, and Municipal Employees, AFL-CIO Locals 196, 318, 478, 610 and 704 of Council 4, Administrative Clerical (NP-3) Bargaining Unit: July 1, 2021 to June 30, 2025*, *supra* note 97, at 84-5; *Education Professions (P-3B) Contract between State of Connecticut and Connecticut State Employees Association SEIU Local 2001: July 1, 2016 to June 30, 2021*, *supra* note 97, at 26.

¹⁰⁴ E.g., *Maintenance & Service Unit (NP-2) Contract between State of Connecticut and Connecticut Employees Union Independent: July 1, 2021 to June 30, 2025*, *supra* note 98, at 23.

- Permission for transfers to return to their original agency following Working Test Period (usually four weeks to four months), either by their own request or by the new agency's decision;¹⁰⁵
- Requirement to consider transfers sympathetically, but not as a mandatory hire, such as by requiring the agency to interview at least one transfer or to provide a written explanation for choosing an open hire;¹⁰⁶
- Allowing those on reemployment lists up to three rejections/failures to respond before taking them off the list or, in some cases, merely bumping them down to the bottom.¹⁰⁷

These provisions all affect the hiring process in different ways. Some simply add time, such as by delaying hiring so that postings can be up long enough. Some introduce uncertainty to a hiring decision's consequences, incentivizing hiring managers to do more paperwork or procedure in case of a later grievance brought by the union. Some just make an agency's job logistically harder, such as by maintaining various transfer lists and tracking down those that are maintained by another entity. And at their most stringent, they require an agency to hire from the mandatory list if they want to hire anyone at all. In general, the diversity of CBA provisions means that different kinds of jobs require different degrees of consideration of mandatory lists before a hiring decision can be made.

Unions want these rules in place because the rules benefit current state employees, and therefore current union members. But unions also want better hiring, so that there are more

¹⁰⁵ E.g., *Contract between State of Connecticut and American Federation of State, County, and Municipal Employees, AFL-CIO Locals 196, 318, 478, 610 and 704 of Council 4, Administrative Clerical (NP-3) Bargaining Unit: July 1, 2021 to June 30, 2025*, supra note 97, at 84; *Contract between State of Connecticut and New England Health Care Employees Union District 1199, Professional Health Care Employees Bargaining Unit (P-1) Contract and Paraprofessional Health Care Employees Bargaining Unit (NP-6) Contract: July 1, 2021 to June 30, 2025*, supra note 97, at 20.

¹⁰⁶ E.g., *Contract between State of Connecticut and American Federation of State, County, and Municipal Employees, Social and Human Services (P-2) Bargaining Unit: July 1, 2021 to June 30, 2025*, supra note 99, at 35; *Collective Bargaining Agreement between State of Connecticut and AFSCME Council 4, Local 3419, DCF Program Supervisors(P-8): July 1, 2021 to June 30, 2024*, supra note 99, at 18.

¹⁰⁷ E.g., *Maintenance & Service Unit (NP-2) Contract between State of Connecticut and Connecticut Employees Union Independent: July 1, 2021 to June 30, 2025*, supra note 98, at 23; *Contract between State of Connecticut and American Federation of State, County, and Municipal Employees, AFL-CIO Locals 196, 318, 478, 610 and 704 of Council 4, Administrative Clerical (NP-3) Bargaining Unit: July 1, 2021 to June 30, 2025*, supra note 97, at 31.

employees. More employees mean that there are more union members in general, and it means that those members are happier and safer because there are more people picking up the slack around them. Unfortunately, the current SRCBAs mean that agencies “spend more bandwidth moving people around than expanding the pie.”¹⁰⁸

Changing that dynamic requires changing the SRCBAs, but political and logistical reasons make that difficult. Politically, unions are currently a massive roadblock to changing the SRCBAs. Despite clear reasons why better hiring would benefit unions, a current DAS official stated that the unions “will never agree to removing any of these rules.”¹⁰⁹ Meanwhile, it is logistically difficult for the state to negotiate a different result through CBAs. Each CBA expires at a different time, and even if the state secures reform of transfer rules with one union, that does not mean the state will secure the same victory with another union. Thus, there is no easy way for the state to create widespread, uniform change through the CBAs alone.

C. Affirmative Action Plans

Standing above all of the other SRCBAs is the Commission on Human Rights and Opportunities (CHRO) and their oversight function. Although CHRO is not involved in any particular hiring decision, “statutes and regulations require agencies to report Affirmative Action plans to CHRO, and agencies have to reverse engineer hiring to meet those plans.”¹¹⁰ It is in this “reverse-engineering” process where gaps between statutory requirements and agency practice appear, creating additional obstacles to efficient hiring on top of already strict affirmative action requirements.

¹⁰⁸ Zoom Interview with Anonymous, *supra* note 7.

¹⁰⁹ *Id.*

¹¹⁰ *Id.*

1. Statutory and Regulatory Requirements

By statute, every state agency with at least twenty-five full-time employees must complete “an affirmative action plan that commits the agency . . . to a program of affirmative action in all aspects of personnel and administration.”¹¹¹ The same statute specifies that CHRO must publish regulations governing the development of these plans.¹¹² However, the statutes themselves provide some guidance, such as the mandate to “recruit [and] appoint . . . state personnel on the basis of merit and qualifications, without regard for race, color, religious creed,” etc., and to “exercise care to ensure utilization of minority group persons.”¹¹³

State agencies are also required to designate a “full-time or part-time equal employment officer,” who is not necessarily an employee of that agency.¹¹⁴ This equal employment officer, in addition to handling discrimination complaints, is responsible for developing and implementing the AA plan for their agency.¹¹⁵ The agency must present their AA plans to CHRO on a regular basis (either annually or biennially, depending on the agency’s size).¹¹⁶ Then, CHRO either approves, conditionally approves, or disapproves those plans within 90 days.¹¹⁷ CHRO also drafts a proposal to achieve compliance for any deficiencies identified in the plan, and if the agency refuses to accept this proposal, CHRO and the agency attempt to resolve their differences through a meeting and a formal letter of commitment.¹¹⁸ If a plan is ultimately disapproved, CHRO may issue a certificate of noncompliance, but it is not required.¹¹⁹ If a certificate of

¹¹¹ CONN. GEN. STAT. § 46a-68(a) (2025).

¹¹² *Id.*

¹¹³ CONN. GEN. STAT. § 46a-70 (2025).

¹¹⁴ CONN. GEN. STAT. § 46a-68(b)(1) (2025) (“*If* such equal employment officer is an employee of the agency...” (emphasis added)).

¹¹⁵ Zoom Interview with Johnette Tolliver, State Program Manager for Affirmative Action/Contract Compliance, Connecticut Commission on Human Rights and Opportunities (Mar. 16, 2026).

¹¹⁶ CONN. GEN. STAT. § 46a-68(c) (2025).

¹¹⁷ CONN. GEN. STAT. § 46a-68(d) (2025).

¹¹⁸ CONN. AGENCIES REGS. § 46a-68-108 (2026).

¹¹⁹ CONN. GEN. STAT. § 46a-68a(a) (2025); *see also* CONN. AGENCIES REGS. § 46a-68-109(a) (2026).

noncompliance is issued, the agency enters a hiring freeze until (1) CHRO finds the agency has complied, (2) CHRO cannot show cause at a hearing, or (3) DAS and OPM permit hiring on a case-by-case emergency basis.¹²⁰

CHRO’s decision on (conditional) approval or disapproval rests mostly on twenty-six factors which determine whether an agency has demonstrated good faith efforts in complying with affirmative action mandates.¹²¹ An agency must demonstrate compliance with each factor; failure on one factor, according to the regulations, means an agency has not demonstrated good faith efforts.¹²² I will highlight just a few here that hinder the hiring process.¹²³

In recruiting candidates, agencies must “make efforts to attract a large and diverse pool of applicants” and “develop a contingency strategy if the initial recruitment effort does not bring in a sufficiently diverse pool.”¹²⁴ This includes contacting “special interest organizations, groups and individuals.”¹²⁵ In interviews, agencies must review the questions and format for bias and have a diverse interview panel.¹²⁶ Agencies have interpreted this to mean that hiring managers must ask the same questions, in the same order, without follow-up—limiting the information available when deciding between candidates.¹²⁷ Hiring managers must also “interview as many applicants as possible to increase opportunity,” keeping written records on all interviewees related to their ability to perform.¹²⁸ The increased volume means hiring managers have to spend

¹²⁰ CONN. GEN. STAT. § 46a-68a(b) (2025).

¹²¹ See CONN. AGENCIES REGS. § 46a-68-92 (2026). While good faith efforts do not need to be found if an agency has simply met all its goals, this is incredibly rare. See *infra* Part IV.C.3.

¹²² *Id.*

¹²³ See Appendix A for all twenty-six factors.

¹²⁴ CONN. AGENCIES REGS. § 46a-68-92(b)(2)-(3) (2026).

¹²⁵ CONN. AGENCIES REGS. § 46a-68-92(b)(4) (2026).

¹²⁶ CONN. AGENCIES REGS. § 46a-68-92(c)(2); (4) (2026).

¹²⁷ Zoom Interview with Anonymous, *supra* note 1.

¹²⁸ CONN. AGENCIES REGS. § 46a-68-92(c)(7)-(8) (2026).

time interviewing candidates they otherwise would not, creating more time and paperwork for officials who are still trying to do their regular jobs.

Confusingly, AA plans are not actually prospective plans; instead, the plans “are more of a review to what [agencies] have already done.”¹²⁹ Each plan has sixteen elements:

1. Policy statement;
2. Internal communication;
3. External communication and recruitment strategies;
4. Assignment of responsibility and monitoring;
5. Organizational analysis;
6. Workforce analysis;
7. Availability analysis;
8. Utilization analysis and hiring and promotion goals;
9. Employment analyses;
10. Identification of problem areas;
11. Upward mobility program and goals;
12. Program goals;
13. Discrimination complaint process;
14. Goals analysis;
15. Innovative programs; and
16. Concluding statement and signature.¹³⁰

As might be surmised by the large number of similarly named elements, perhaps the most important aspect of affirmative action plans are the various analyses that agencies are required to complete. These analyses produce a comparison of the racial and sexual demographics of the agency workforce and the demographics of the population that *could* be working for the agency.¹³¹ If this comparison reveals underutilized groups, the agency is required to create a goal to recruit those groups and develop programs to do so.¹³² Specifically, if an agency finds that certain demographics are underrepresented within the agency’s workforce, candidates with those

¹²⁹ Zoom Interview with Tanya Hughes, Executive Director, Connecticut Commission on Human Rights and Opportunities (Mar. 16, 2026).

¹³⁰ CONN. AGENCIES REGS. § 46a-68-77 (2026).

¹³¹ CONN. AGENCIES REGS. § 46a-68-83 to -85 (2026).

¹³² CONN. AGENCIES REGS. § 46a-68-85 to -88 (2026).

characteristics become goal candidates.¹³³ These characteristics are tracked for the total applicant pool, the applicants that are qualified, and the applicants that are interviewed.¹³⁴

Johnette Tolliver, the State Program Manager for Affirmative Action Compliance, is careful to note that agencies are not obligated to hire someone just because they are a goal candidate. “Goals are nice, but you have to hire the most qualified person. Because if you hire someone just because they’re a goal, that’s a discrimination complaint. If you’re not hitting goals, it’s an indication that you aren’t targeting certain populations effectively.”¹³⁵ However, the language of the regulations nevertheless incentivizes agencies to hire goal candidates. The regulations state that, “when a goal is met, the agency shall identify the candidate as a goal candidate. No other information is required.”¹³⁶ But if a goal is not met, the agency must provide “a narrative . . . explaining why each goal candidate was eliminated. Each unmet goal, by job search, shall be separately addressed by narrative and the discussion of each goal applicant shall be detailed and complete.”¹³⁷ Thus, an agency actually has to do *more* work to hire a more qualified non-goal candidate compared to a less qualified goal candidate. Now, interviews with state officials indicate that agencies do not regularly forgo a more qualified candidate for that reason. But this only means that agencies are regularly doing more work to justify a qualified hire when that person happens to fall outside of a given race and/or sex.

2. *Agency Practice*

These narrative requirements add another element of delay through the level of detail provided by the hiring agency, and this delay may be compounded by confusion over what is

¹³³ CONN. AGENCIES REGS. § 46a-68-90 (2026).

¹³⁴ *Id.*

¹³⁵ Zoom Interview with Johnette Tolliver, *supra* note 113.

¹³⁶ CONN. AGENCIES REGS. § 46a-68-90(c) (2026).

¹³⁷ CONN. AGENCIES REGS. § 46a-68-90(d) (2026).

required. The regulations state that narratives must be “detailed and complete,” but Tanya Hughes, Executive Director of CHRO, states that, “for interview narratives, it isn’t that long. Two or three sentences per candidate. We aren’t asking for a thesis.”¹³⁸ Nevertheless, Johnette Tolliver added that “some give it, and we’ll take it.”¹³⁹ These comments, combined with the language of the regulations, indicate that there is a great deal of disparity between and within agencies as to the level of detail provided in interview narratives. Moreover, it appears that a number of hiring managers are providing more detail than necessary, lengthening the time to do interview paperwork beyond what is actually required.

The confusion over narrative detail extends to what can be included as a reason. A hiring manager for the Department of Social Services explained the paperwork as requiring “specifics based on interview responses.”¹⁴⁰ Likewise, CHRO officials acknowledged agency complaints about the difficulties of providing these explanations, although CHRO disputes the salience of those complaints. Ms. Hughes stated, “if two candidates are qualified but one shows up ten minutes late, that’s a reason. We aren’t asking why candidates are not qualified but why you didn’t hire them.”¹⁴¹ Similarly, Ms. Tolliver stated that agencies should “just be honest about why you didn’t select a candidate. I think it’s only difficult if you aren’t honest.”¹⁴² Based on CHRO staff’s attitudes toward the narratives, the legal requirement of a narrative may actually be quite low. Perhaps agencies could satisfy the narrative through references to criteria surrounding the interview more broadly—not just the interview responses themselves—such as professionalism, timeliness, or ability to work with others. In that case, Ms. Tolliver’s hypothesis

¹³⁸ Zoom Interview with Tanya Hughes, *supra* note 126.

¹³⁹ Zoom Interview with Johnette Tolliver, *supra* note 113.

¹⁴⁰ Zoom Interview with Anonymous, *supra* note 1.

¹⁴¹ Zoom Interview with Tanya Hughes, *supra* note 126.

¹⁴² Zoom Interview with Johnette Tolliver, *supra* note 113.

of dishonesty makes sense; difficulty would only arise if an agency needed to come up with pretextual reasons for eliminating someone because of their race.

Even if the legal requirement is actually low, however, strong political and process pressures may push hiring managers into extensive and meticulous narratives. For one, the agency knows that these decisions will ultimately be presented to CHRO as part of an overall agency hiring picture. Among the “good faith” factors described above, agencies must “ensure that selection panel members are aware of the impact of common biases such as stereotyping, unsubstantiated first impressions that may influence a decision, and assessments based on different ‘comfort levels’ with people of dissimilar groups.”¹⁴³ Agencies may therefore be reluctant to resort to explanations that are not strictly tied to concrete, specific details. Nebulous qualities related to personality are likely suspect under this factor, as those personality judgments are often informed—consciously or unconsciously—by bias.

Moreover, the process itself does not answer only to the letter of the law. Even though CHRO staff like Ms. Tolliver and Ms. Hughes are the first to review submitted affirmative action plans, CHRO staff do not have the final say. Instead, according to Ms. Tolliver,

The [politically appointed] commissioners are the final approval. They have final approval on our findings based on statutory factors They may ask us some questions and listen to the agency head but at the end of the day they decide. It’s really unpredictable what commissioners end up deciding when there are findings from CHRO that are disapprovals.¹⁴⁴

As a current DAS official stated, “it is a televised, public hearing. No one wants to get embarrassed, or worse, called a racist. There is a huge psychological weight that gets assigned to

¹⁴³ CONN. AGENCIES REGS. § 46a-68-92(c)(9) (2026).

¹⁴⁴ Zoom Interview with Johnette Tolliver, *supra* note 113.

this. We help infuse parts of the process to guard against it. We would have to explain outreach, reasoning, candidates, etc.”¹⁴⁵

Because of these hearings, agencies are further incentivized to be extremely careful in their interview narratives, or else agency commissioners might face political blowback from CHRO commissioners. Agencies are thus not only thinking about what is legally required to satisfy the expectations of the trained CHRO staff; agencies are also thinking about what might create a political battle in front of the appointed commissioners. And if the commissioners are unhappy enough, agencies may face a huge punishment: an agency-wide hiring freeze.¹⁴⁶ While this happens rarely, it does happen; Ms. Tolliver has seen it occur twice in the past fifteen years.¹⁴⁷ The commissioners can only issue this punishment if the underlying statutory factors are established, of course, but the threat’s existence ensures that agencies pay close attention to the commissioners’ attitudes in addition to the legal requirements.

Interview narratives are not the only point of confusion between CHRO requirements and agency expectations. Indeed, there is confusion about a basic component of affirmative action plans: the goals themselves.

Because goals are created by comparing the agency workforce to state demographics, sometimes white males are underrepresented, becoming goal candidates. As a current DAS official stated, “you question the value of all that work when ultimately the goal is to hire a white male.”¹⁴⁸ But CHRO staff does not view that result as surprising or undesirable. “Agencies expect people of color, but it is about underrepresented groups. It could be white males, for one

¹⁴⁵ Zoom Interview with Anonymous, *supra* note 7.

¹⁴⁶ CONN. GEN. STAT. § 46a-68a(b) (2025).

¹⁴⁷ Zoom Interview with Johnette Tolliver, *supra* note 113.

¹⁴⁸ Zoom Interview with Anonymous, *supra* note 7.

agency, and that is a goal.”¹⁴⁹ Some agency officials appear to view affirmative action as increasing representation of historically disadvantaged groups, whereas CHRO staff appears to view it as promoting parity between state and workforce demographics. Each position has its strengths and weaknesses, and this Paper does not take a position as to which would be more effective from a hiring perspective. But there is something wrong with a state hiring process that is internally divided regarding something as basic as the purpose of affirmative action goals.

These various points of confusion are symptomatic of a statewide approach to CHRO, equal employment, and affirmative action that indicates deliberate separation at best and active devaluation at worst. On one level, this dynamic plays out through political organization. Ms. Hughes states,

Executive agencies meet regularly, but CHRO does not, which keeps us away from conflicts. We don’t sit around the table. But it also means CHRO is sometimes delayed in info. We might get a meeting with an aide rather than with a Secretary [of a department]. This dissection [between agencies] is more policy [than statutory]. There were times when everyone was invited. It didn’t seem as adversarial.¹⁵⁰

Current state policy dictates that CHRO is kept separate and apart from other agencies, such that communication between them is stifled. While this has some advantages for CHRO’s watchdog function, it also results in communication breakdown, leading to the confusion, uncertainty, and varied practice described above.

On another level, the statewide approach also plays out through logistical obstacles. Affirmative action plans are extremely comprehensive, and putting them together is “difficult . . . very challenging and stressful.”¹⁵¹ Though there are some resources available to agencies in putting them together, “resources are a big problem across the state. Equal

¹⁴⁹ Zoom Interview with Johnette Tolliver, *supra* note 113.

¹⁵⁰ Zoom Interview with Tanya Hughes, *supra* note 126.

¹⁵¹ Zoom Interview with Johnette Tolliver, *supra* note 113.

employment is a big bottleneck. They don't have enough, or any, clerical support. They're often not given the tools to succeed."¹⁵² But clerical support is often the least of the problems faced by agencies when dealing with affirmative action. "Some equal employment offices are more thorough than others. Some agencies don't have equal employment officers assist them; Agriculture for years didn't have one, and this year they had a retiree help them. Resources aren't there across the state."¹⁵³ CHRO itself did not have an equal employment officer until quite recently, though it still lacks extra clerical staff.¹⁵⁴ In response to these issues, CHRO staff do not have many fixes available: currently, agencies "can talk to each other [for tips/tricks] or have retirees assist,"¹⁵⁵ whereas "additional support would require budget adjustments."¹⁵⁶

These suggestions are made in good faith by CHRO staff, and they reflect years of an office doing its best to fulfill statutory mandates under tight constraints. For over a decade now, CHRO has existed under a Memorandum of Understanding with DAS and the Department of Labor because the Commission had lost so many employees through attrition—without new hires—that it did not make sense for CHRO to have its own office and staff.¹⁵⁷ With this history, their suggestions are understandable.

But they are not solutions. Agencies are required by statutes and regulations to complete extraordinarily complex and thorough affirmative action plans, and retirees cannot fill the gap.

While retirees may suffice for discrete problems, equal employment officers serve a vital

¹⁵² Zoom Interview with Tanya Hughes, *supra* note 126.

¹⁵³ *Id.*

¹⁵⁴ *Id.*

¹⁵⁵ Zoom Interview with Johnette Tolliver, *supra* note 113.

¹⁵⁶ Zoom Interview with Tanya Hughes, *supra* note 126.

¹⁵⁷ *Id.*; see also JOHN C. GERAGOSIAN & ROBERT J. KANE, AUDITOR'S REPORT: COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES FOR THE FISCAL YEARS ENDED JUNE 30, 2013, 2014, 2015, AND 2016, at 5 (2018), https://www.cga.ct.gov/apa/reports/Human%20Rights%20and%20Opportunities,%20Commission%20on_20180801_FY2013,2014,2015,2016.pdf.

function within agency hiring processes (not to mention everything those officers do outside of hiring). As one example beyond assembling plans, equal employment officers also assist in developing interview questions—because if interview questions are not related to preferred criteria, then hiring managers cannot properly explain and justify their decisions later on.¹⁵⁸ Without full-time equal employment officers there to shepherd an agency through the SRCBA-required process, agencies inevitably take more time to accomplish their hiring goals or eventually fail CHRO oversight, leading to even greater limitations on hiring.

The statutes and regulations related to affirmative action undoubtedly slow the hiring process in and of themselves. Ironically, because the state cannot hire the people who are supposed to implement those policies, the process becomes even slower.

3. Impact

Despite the weight given to affirmative action plans, their actual impact is far from clear. Even though the statutes have required affirmative action plans for decades, agencies still regularly do not meet their goals. But instead of resulting in forced systemic change, agencies are usually found to be acting in good faith and approved, only to see the same result the following year. Occasionally, plans are not approved, but disapprovals also do not lead to agencies meeting goals next time; instead, agency improvement following a disapproval is usually marked by a finding of a good faith failure to meet those goals.

In 2025, not a single agency met, or even substantially met, its hiring and promotions goals.¹⁵⁹ Regardless, all but two were approved completely, and one of those two was still

¹⁵⁸ Zoom Interview with Johnette Tolliver, *supra* note 113.

¹⁵⁹ See Appendix B for a table summarizing all 42 plans presented to CHRO in 2025 by presenting agency, documenting whether the agency met their hiring and promotion goals (program goals are unrelated to hiring), the ultimate finding, and the agency's recent history of (dis-)approvals.

conditionally approved. Moreover, a number of agencies have a history of disapprovals—including disapprovals for failure to file a plan at all—yet were still approved despite not meeting their goals. To find an example of an agency meeting its goals, one must look to 2024, when three agencies—the Department of Consumer Protection, the Department of Economic and Community Development, and Connecticut State Colleges and Universities—substantially met their hiring and promotion goals.¹⁶⁰

If only three agencies out of the entire state have substantially met their goals in the past two years, affirmative action plans do not appear to actually effectuate those goals. Instead, the vast majority of agencies perform the requisite “good faith” actions, fail to achieve their goals, and continue on year after year. In the rare times when agencies are disapproved or conditionally approved, they simply conform to the good faith requirements the following year without meeting their goals. Even neglecting to file plans at all seems to have few consequences, and it is difficult for an agency to actually be disapproved. Some of this may be because CHRO will try to work with agencies who file on time to fix any errors.¹⁶¹ But even after that support, the result is a system that achieves neither representation nor efficiency. Instead, agencies are forced to act according to strict affirmative action requirements, under tight logistical constraints, and subject to often-intense public scrutiny for those actions—not to achieve actual representation, but only the appearance of trying.

Of course, there is value in trying. Publishing goals and tracking the extent to which agencies have met those goals demonstrates the state’s commitment to affirmative action and

¹⁶⁰ See generally *Commission Meeting Schedule*, COMM’N ON HUM. RTS. AND OPPORTUNITIES, <https://portal.ct.gov/chro/commission/commission/commission-meeting-schedule> (last accessed Mar. 29, 2026) (providing minutes for each CHRO meeting, including details on affirmative action plan approvals and disapprovals).

¹⁶¹ Zoom Interview with Tanya Hughes, *supra* note 126.

values of fairness and equity in hiring. It keeps those principles at the forefront of any conversation about the hiring process and ensures that a hiring manager will consider them in their decision. It is also entirely possible that the state is more representative than it otherwise would be without the affirmative action plans in place, even if it is not as representative as the plans would prefer. But it is also possible that the affirmative action plans have had no effect, and it is certainly true that they have not had effect hoped for by the legislature. As a result, one wonders how hard the state is actually trying if it has maintained a system that has not actually achieved its goals for so long, without attempting other solutions. At the very least, there must be other ways to signal a commitment to fairness and equity than the highly specific—and highly arduous—form that Connecticut’s affirmative action plans take.

V. Recommendations

The system described above is the reformed system. Fortunately for the state, numerous changes have already been adopted to make the hiring system more effective. Before, HR was not centralized, resulting in uneven practices and different levels of expertise.¹⁶² At that time, a huge chunk of the hiring process was manual, consisting of various Microsoft Word and Excel documents and individual emails.¹⁶³ Now, HR uses the same platform, allowing the state to collect data more effectively (including the time-to-hire database referenced above).¹⁶⁴ This platform allows HR to automate a number of processes to speed them up.¹⁶⁵ Public Act 23-194 eliminated many statutory barriers to efficient and effective hiring, making room for much of the discretion currently afforded to hiring managers to hire the most qualified candidate.¹⁶⁶

¹⁶² Interview with Josh Geballe, *supra* note 4.

¹⁶³ Zoom Interview with Anonymous, *supra* note 7.

¹⁶⁴ *Id.*

¹⁶⁵ *Id.*

¹⁶⁶ 2023 Conn. Legis. Serv. P.A. 23-194 (S.B. 984) (West). (such as allowing a hiring manager to immediately fill a position if necessary and begin screenings as soon as a position is posted).

These reforms are a highly promising start, and according to state officials' experiences, the hiring process subsequently improved.¹⁶⁷ But the reforms did not touch mandatory lists or affirmative action requirements. And without addressing those two areas, hiring managers are unable to exercise the discretion otherwise afforded to them under the statutes and regulations.

Unfortunately, there is not one simple fix, although there a range of possible options. From an efficiency perspective, the most effective solution would be to eliminate mandatory lists from agency consideration and the requirement that agencies submit affirmative action plans.

The former is more difficult, given that mandatory lists also exist within individually negotiated CBAs. Here, the legislature could pass a statute superseding these agreements, although it would also have to amend the current statutory scheme which states that CBAs prevail over state laws and regulations when there is a conflict “on matters appropriate to collective bargaining.”¹⁶⁸ Even then, unions could raise a constitutional Contract Clause claim in response.¹⁶⁹

It is difficult to predict whether this claim would succeed in most contexts, but in at least one respect the state is likely to win: competitive vacancies. State statutes governing collective bargaining make clear that unions cannot negotiate any terms that will diminish the authority of DAS “or any state agency established by statute, charter or special act to establish, conduct, and grade merit examinations and to rate candidates in order of their relative excellence.”¹⁷⁰ Indeed, some CBAs already explicitly state that provisions regarding mandatory lists apply only to

¹⁶⁷ Zoom Interview with Anonymous, *supra* note 7; Interview with Josh Geballe, *supra* note 4.

¹⁶⁸ CONN. GEN. STAT. § 5-278(e)(1) (2025).

¹⁶⁹ LEE HANSEN, OFF. OF LEGIS. RSCH., QUESTIONS ON PUBLIC EMPLOYEE SUPERSEDEENCE LAWS 4 (2019), <https://www.cga.ct.gov/2019/rpt/pdf/2019-R-0327.pdf>.

¹⁷⁰ CONN. GEN. STAT. § 5-272(d) (2025).

noncompetitive vacancies.¹⁷¹ Currently, there is no clear conflict if CBAs require consideration for competitive vacancies also; despite relative flexibility in other areas of the statutory scheme, current SRCBAs all align in requiring agencies to give great weight to mandatory lists in competitive positions as well.¹⁷² But if amended statutes explicitly barred consideration of mandatory lists for competitive vacancies, the CBAs would hold no weight. This statutory change would automatically remove mandatory lists from consideration in all competitive vacancies—the vast majority of state jobs.

Short of barring consideration of mandatory lists, the state could implement a variety of smaller reforms. For instance, the state could pass a statute requiring consideration of lists, but without the strong near-mandatory language of the current regulations, and potentially with language clarifying that agencies ultimately must hire the most qualified candidate.

Alternatively, the state could introduce logistical improvements over time, particularly as CBAs are renegotiated. Centralizing databases for easier access would save significant time; currently, agencies are required to search through dozens of lists housed in various locations to accomplish their SRCBA obligations. Some CBAs specify where and how transfer lists are to be maintained, but most do not, and as those few CBAs are renegotiated, incorporating those lists into a central database is unlikely to be a point of strong contention. After all, it will only make it easier for agencies to access the lists that unions want accessed during the hiring process, and it will make it easier for agencies to manage as requests come on and off the list over time. Similarly, CBAs requiring job postings could be renegotiated into a centralized job posting system accessible only

¹⁷¹ See, e.g., *Contract between State of Connecticut and New England Health Care Employees Union District 1199, Professional Health Care Employees Bargaining Unit (P-1) Contract and Paraprofessional Health Care Employees Bargaining Unit (NP-6) Contract: July 1, 2021 to June 30, 2025*, *supra* note 97, at 19.

¹⁷² See, e.g., CONN. GEN. STAT. § 5-228 (2025); CONN. GEN. STAT. § 5-241 (2013); CONN. AGENCIES REGS. § 5-228-1 (2026).

to state employees or location-wide email notices. Alternatively, the state could eliminate or amend the requirement that postings be maintained for a certain length of time before hiring is completed by specifying that competitive vacancies are to be filled as soon as the agency has found a candidate that is sufficiently qualified, according to the hiring manager's discretion, without further delay.

Eliminating affirmative action plans has a more straightforward solution in theory, although it is still difficult in practice. Eliminating plans would require (1) the legislature passing a statute to override the current regulations or (2) CHRO passing regulations changing the required elements of affirmative action plans. Regulations are unusually difficult to pass in Connecticut, however, due to a requirement that every proposed regulation must be approved by the Legislative Regulation Review Committee.¹⁷³ By statute, that committee must be half Republican and half Democratic.¹⁷⁴ Because regulations have to go through a bipartisan legislative committee, and because the Connecticut legislature has a Democratic supermajority, it is often easier to pass a statute than a regulation. However, there are also political disadvantages from a statute. A statute would be a clear signal from the legislature against the current affirmative action plans, which could create political blowback if not drafted delicately. Of course, the plans need not only be eliminated; they could instead be replaced with a different, more streamlined procedure that better accomplishes the goals of fairness and equity in hiring.

Short of complete elimination or replacement of the plans, a key area of reform would be interviews, which again may be eliminated or amended. Interview narratives, if retained, could be specified as brief and to the point, or even recharacterized as a form where a hiring manager checks off the presence or absence of minimum and preferred qualifications during the interview

¹⁷³ CONN. GEN. STAT. § 4-170b (2025) (requiring agencies to submit regulations to the committee).

¹⁷⁴ CONN. GEN. STAT. § 4-170 (2025) (requiring four members from each major party).

itself. Given CHRO's statements that reasons must simply be related to qualifications, the absence of a qualification in one candidate or presence in another would create a *prima facie* justification for a hire. In either case, the statutes or regulations could give deference to hiring managers for their reasoning when interpreting narratives.

The state also has smaller-scale logistical solutions available to it with regard to affirmative action plans. CHRO staff has already indicated that there are no obvious problems with a bank of interview questions maintained by an agency's equal employment officer.¹⁷⁵ Creating this bank of questions would eliminate the need for an agency to get new questions approved for each set of interviews, and it might also allow more flexibility for hiring managers to ask questions in different orders and with relevant follow-up in the interviews themselves. The state might also centralize the creation of agency analyses, using the newly centralized HR systems. Although the statutes and regulations still require agency-specific analyses, it is not clear why each agency must complete these analyses on their own. Centralizing analyses has the benefit of equalizing agency thoroughness, expertise, and resources, all of which now vary in equal employment offices throughout the state.

At the very least, if no other changes occur, the state must invest more resources into ensuring every agency has an EEOO with sufficient support, or else there will continue to be delays in a statutorily required component of the hiring process. The state would simultaneously need to ensure more coordination between CHRO and other state agencies to address the fact that, as of 2026, agencies often have a very different understanding of what CHRO actually requires. If CHRO, EEOOs, and affirmative action plans remain a central part of the process,

¹⁷⁵ Zoom Interview with Johnette Tolliver, *supra* note 113. However, hiring managers would have to take care not to repeat sets of questions for any candidate who interviews more than once, to prevent that candidate from gaining any advantage from interviewing multiple times.

then they ought to be treated as such. Indeed, to the extent that signaling a commitment is the main purpose of affirmative action plans, continued underinvestment in CHRO and equal employment undercuts that commitment. The more resources are diverted away from these components without changing the underlying structure, the more that structure becomes an obstacle to efficient hiring.

Finally, leaning further into mandatory lists may speed up the CHRO process, although it would also expand the reach of mandatory lists. Under the current scheme, the two components sometimes operate synergistically. A current DAS official stated that “some interactions are positive, like explaining why you’re filling with a transfer.”¹⁷⁶ If more positions are filled through mandatory lists, it becomes easier to complete interview narratives.

All of the above suggestions implicate political considerations. Unions will oppose changes to rules that benefit their current members, and affirmative action advances important values of fairness and procedural integrity. Neither concern is without merit, nor should the state abandon all efforts to listen to its workers or promote equal employment.

The SRCBAs do not unilaterally advance those goals, however. Mandatory lists may help current union members. But so does better hiring. Better hiring means more and better workers, which translates to fewer demands on current workers and greater safety (most particularly in public safety, corrections, roadside construction and maintenance, and direct service provision). Having more employees also helps the unions, by providing more dues-paying members and strengthening bargaining power. And if agencies are already finding ways to avoid mandatory lists—like by carefully crafting minimum qualifications to avoid transfers—then mandatory lists are not even fulfilling the promise of benefitting current union members.

¹⁷⁶ Zoom Interview with Anonymous, *supra* note 7.

Likewise, affirmative action plans' track record of unmet goals indicates that the plans are not fulfilling their purpose. Yet agency plans are still regularly approved because the agencies are doing everything that CHRO can think to do. The only success that these plans have, then, is in ensuring that agencies are following certain procedures. But if these procedures are not actually achieving the goal of a representative workforce, then what value is there in maintaining them instead of trying something different?

Both areas also provide opportunities for the state to invite political opposition to cooperatively create a new solution. Mandatory lists, for instance, could be replaced by an individualized form of oversight. Lists, in theory, provide a formal framework to benefit current state employees (and union members) in hiring decisions, but mandatory lists also insulate unions from the reality of the process and encourage state employees to create workarounds to avoid the lists. Instead of providing a formal process that keeps unions separated, union representatives could instead be included within individual hiring decisions, ensuring that state employees receive due consideration while still making unions partially responsible for the outcome of those decisions. This form of individualized oversight might provide more protections for state employees in practice, advancing unions' core concerns while also providing more flexibility to state hiring managers.

The affirmative action requirements are also likely to come under increasing scrutiny under *Students for Fair Admission v. Harvard University*.¹⁷⁷ Although CHRO insists that agencies must hire the most qualified candidate and that goals are not to be considered in this evaluation, tracking of race and sex as goal characteristics may run afoul of *Students for Fair Admission*'s holding that consideration of race as a "plus" violates the Equal Protection

¹⁷⁷ 600 U.S. 181 (2023).

Clause.¹⁷⁸ Certainly, “there is an incredible emphasis on meeting goals, and it is a blurry line between goals and quotas. The legality of our state process is another unspoken elephant in the room.”¹⁷⁹ While there is an elaborate process set up to establish that these are goals and not quotas, that process may not be sufficient in the face of a Supreme Court skeptical of any consideration of protected characteristics when merit is the baseline. CHRO thus has an opportunity to get ahead of this scrutiny by working with agencies to create new procedures that are more efficient and better satisfy important values of fairness and procedural integrity.

For both unions and CHRO as well as the state as a whole, there is little reason for loyalty to the current system, and a great deal to be gained from change. Connecticut has already taken great strides, but mandatory lists and affirmative action plans remain “large and heavy hidden hand[s]” in the process.¹⁸⁰ Reforming them is critical to a modern, merit-based, responsive civil service hiring system.

¹⁷⁸ See *id.* at 30 (holding that university affirmative action programs violated the Equal Protection Clause for using race as a reason to admit applicants); see also *id.* at 211 (reaffirming that quotas are unconstitutional).

¹⁷⁹ Zoom Interview with Anonymous, *supra* note 7.

¹⁸⁰ *Id.*

Appendix A – Affirmative Action “Good Faith” Factors¹⁸¹

An agency has demonstrated good faith efforts when it has engaged in the initiatives articulated in subsections (a) to (d), inclusive, of this section:

- (a) Promoted equal opportunity to achieve a workplace that is free of discrimination;
 - (1) communicate the agency's commitment to equal employment opportunity and affirmative action to all employees;
 - (2) ensure that employees are aware of nondiscrimination policies and procedures; post policies in a visible location.
 - (3) ensure that departmental processes, procedures, and systems are nondiscriminatory and free of bias;
 - (4) evaluate supervisors for making good faith efforts in equal employment opportunity and affirmative action; document in performance appraisals;
 - (5) ensure that reasonable accommodations are made for disabled employees;
 - (6) take appropriate and timely action when there has been an allegation of sexual harassment; and,
 - (7) provide training to employees to enhance their knowledge of non-discrimination.
- (b) Developed recruitment strategies that ensure opportunities for all qualified applicants, including underutilized groups;
 - (1) identify affirmative action placement goals for all job openings.
 - (2) make efforts to attract a large and diverse pool of qualified applicants, particularly inclusive of groups associated with affirmative action recruitment goals.
 - (3) develop a contingency strategy if the initial recruitment effort does not bring in a sufficiently diverse pool.
 - (4) contacting special interest organizations, groups and individuals.
 - (5) or other means of outreach utilized to hire goal candidates.
- (c) Ensured a fair and nondiscriminatory selection process; and
 - (1) review the selection process to ensure that it treats each applicant fairly and consistently.
 - (2) review the interview format and questions for possible bias.
 - (3) ensure that reasonable accommodations are made for applicants.
 - (4) if using a group interview process; create a diverse selection panel.
 - (5) assess all applicants using the same selection criteria.
 - (6) consider all skills that qualify the applicant, including volunteer and professional experience.
 - (7) interview as many applicants as possible to increase opportunity.
 - (8) keep written records of all applicants interviewed and be certain that the information recorded relates to the individual's ability to perform the duties.
 - (9) ensure that selection panel members are aware of the impact of common biases such as stereotyping, unsubstantiated first impressions that may influence a decision, and assessments based on different "comfort levels" with people of dissimilar groups.

¹⁸¹ CONN. AGENCIES REGS. § 46a-68-92 (2026).

(10) document the selection process fully. Retain all records.

(d) Provided career development opportunities to all interested and qualified employees, with emphasis on those groups found to be underutilized in the workforce;

(1) encourage staff to participate on agency committees to enhance development.

(2) inform all staff of internal staff development and promotional opportunities.

(3) promote and support employee training and development for all employees.

(4) provide career counseling.

(e) Nothing in this section shall be construed to absolve an agency of its obligations under sections 46a-68-78, 46a-68-79, 46a-68-80, 46a-68-81, 46a-68-85, 46a-68-87, 46a-68-89, and 46a-68-90 and 46a-68-92 of the Regulations of Connecticut State Agencies.

Appendix B – 2025 Affirmative Action Plans by Agency¹⁸²

Agency	Goals Met?	Finding	Recent History of Findings
Office of Secretary of State	No	Approved (Good Faith)	• 2023: Disapproved • 2022: Approved • 2021: Disapproved • 2019: Approved • 2018: Approved
Western Connecticut State University	No	Approved (Good Faith)	• 2023: Disapproved • 2022: Approved • 2021: Approved • 2020: Conditionally Approved • 2019: Approved
Department of Emergency Services and Public Protection	No	Approved (Good Faith)	• 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved • 2019: Approved
Department of Banking	No	Approved (Good Faith)	• 2023: Approved • 2021: Approved • 2019: Approved • 2017: Approved • 2015: Approved
Department of Public Health	No	Approved (Good Faith)	• 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved • 2019: Approved
Department of Energy and Environmental Protection	No	Approved (Good Faith)	• 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved • 2019: Approved

¹⁸² See generally *Commission Meeting Schedule*, COMM’N ON HUM. RTS. AND OPPORTUNITIES, <https://portal.ct.gov/chro/commission/commission/commission-meeting-schedule> (last accessed Mar. 29, 2026) (providing minutes for each CHRO meeting, including details on affirmative action plan approvals and disapprovals).

Connecticut State Community Colleges	N/A (First Filing)	Approved	N/A
Central Connecticut State University	No	Approved	• 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved • 2019: Approved
Department of Labor	No	Conditionally Approved (following recommendation of disapproval)	• 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved • 2019: Approved
Office of State Treasurer	No	Approved (Good Faith)	• 2024: Disapproved • 2022: Approved • 2020: Approved • 2018: Approved • 2017: Approved
Department of Revenue Services	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved
Department of Veterans Affairs	No	Approved (Good Faith)	• 2023: Approved • 2022: Approved • 2021: Disapproved (failure to file) • 2020: Disapproved • 2018: Approved
Department of Social Services	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved
Office of Health Strategy	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved
State Elections Enforcement Commission	No	Approved (Good Faith)	• 2024: Approved • 2023: Disapproved (failure to file) • 2022: Approved • 2021: Approved • 2020: Approved

Charter Oak State College	No	Approved (Good Faith)	• 2023: Approved • 2021: Approved • 2019: Approved • 2018: Approved • 2017: Approved
University of Connecticut	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved
Connecticut State Library	No	Approved (Good Faith)	• 2023: Approved • 2021: Approved • 2019: Approved • 2017: Approved • 2015: Approved
Department of Aging and Disability Services	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved
Department of Mental Health and Addiction Services	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Disapproved
Connecticut Military Department	No	Approved (Good Faith)	• 2024: Disapproved • 2022: Approved • 2021: Approved • 2020: Disapproved • 2019: Disapproved
Commission on Human Rights and Opportunities	No	Approved (Good Faith)	• 2023: Approved • 2021: Approved • 2019: Conditionally Approved • 2017: Approved • 2015: Conditionally Approved
Connecticut Technical Education and Career System	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved

Connecticut Department of Transportation	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Disapproved • 2021: Approved • 2020: Approved
Office of the Attorney General	No	Approved (Good Faith)	• 2024: Conditionally Approved • 2023: Disapproved • 2022: Approved • 2021: Approved • 2020: Approved
Department of Children and Families	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved
Office of the State Comptroller	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved
Office of the Chief Medical Examiner	No	Disapproved	• 2023: Approved • 2021: Approved • 2019: Approved • 2018: Approved • 2017: Disapproved
Eastern Connecticut State University	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved
Department of Administrative Services	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved
Department of Labor	No	Approved (Good Faith)	• 2024: Conditionally Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved

Metropolitan District Commission	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved
Southern Connecticut State University	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved
Workers Compensation Commission	No	Approved (Good Faith)	• 2023: Approved • 2021: Approved • 2019: Approved • 2017: Approved • 2015: Approved
Department of Agriculture	No	Approved (Good Faith)	• 2023: Approved • 2021: Approved • 2019: Approved • 2017: Approved • 2015: Approved
Office of the Chief State's Attorney-Division of Criminal Justice	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved
Office of Early Childhood	No	Approved (Good Faith)	• 2023: Approved • 2021: Approved • 2019: Approved • 2017: Disapproved • 2016: Disapproved
Department of Motor Vehicles	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Disapproved (failure to file) • 2021: Approved • 2020: Approved
UConn Health	No	Approved (Good Faith)	• 2024: Approved • 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved

Department of Correction	No	Approved (Good Faith)	• 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved • 2019: Approved
Department of Developmental Services	No	Approved (Good Faith)	• 2023: Approved • 2022: Approved • 2021: Approved • 2020: Approved • 2019: Approved
Connecticut Insurance Department	No	Approved (Good Faith)	• 2022: Approved • 2021: Approved • 2020: Disapproved • 2018: Approved • 2016: Approved