

State of Connecticut COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Contract Compliance Unit- 450 Columbus Boulevard, Suite 2, Hartford, CT 06103

Promoting Equality and Justice for all People

IMPORTANT UPDATES TO STATE CONTRACT COMPLIANCE REQUIREMENTS

Effective October 1, 2025, Connecticut law has been updated to strengthen requirements for public works projects. Contractors and awarding agencies should review the changes below to ensure timely compliance.

Key Statutory Changes

- For public works contracts entered into after October 1st, plans will only need to be submitted when the state-funding is \$150,000 or more.
- Good Faith Efforts (GFE) Plans replace Set-Aside Plans and Affirmative Action Plans.
- Spending Allocation Goals (SAGs) replace prior set-aside percentages.
 - Until further changes go into effect July 1, 2026, goals will remain 25% of the state-funded contract value for SBEs and 6.25% of the state-funded contract value for MBEs.
 - Awarding agencies must notify CHRO of project SAGs when bids are released.

AT A GLANCE:

- Threshold for public works contracts raised to \$150,000
- Reduced Plan Requirements
- Monthly Monitoring Forms Eliminated

Plan Format:

- Plans will no longer require policy statements or internal/external communications be submitted.
- The sections on monitoring forms have been revised.
- For the most recent version of the plan template, please go to our website.

Monthly Reports:

• Effective October 1, 2025, Monthly Reports will no longer be required for all projects, including those started prior to the effective date.

Compliance at Close-Out:

• Within 45 days of substantial completion, contractors must submit: subcontractor payment documentation, lien waivers, and any outstanding subcontract notifications.

Prompt Payment:

• General contractors must pay subcontractors within 15 days of the due date, unless there is a bona fide dispute.

Enforcement and Penalties:

- Failure to file plans, meet deadlines, or make good faith efforts will be subject to enforcement that may lead to:
 - Withholding of contract payments
 - Disqualification from future bidding
 - Civil penalties and legal action by CHRO

What's Next

 New forms and documentation requirements will be made available ahead of the July 1, 2026 implementation of project-specific goals.