

<b>Act Number</b>	<b>Session</b>	<b>Bill Number</b>	<b>Total Number of Committee Pages</b>	<b>Total Number of House Pages</b>	<b>Total Number of Senate Pages</b>
PA 71-854		5408	5	12	1
<u>Committee Pages:</u> <ul style="list-style-type: none"> <li>• <i>Government Administration and Policy</i> 273-277</li> </ul>				<u>House Pages:</u> <ul style="list-style-type: none"> <li>• 4886-4897</li> </ul>	<u>Senate Pages:</u> <ul style="list-style-type: none"> <li>• 3242(<i>consent</i>)</li> </ul>

**H-118**

**CONNECTICUT  
GENERAL ASSEMBLY  
HOUSE**

**PROCEEDINGS  
1971**

**VOL. 14  
PART 11  
4831-5162**

Friday, June 4, 1971 56.

Health Care System, Research and Training Program.

EFH

CARL R. AJELLO, JR.:

Mr. Speaker, may this item be passed retaining its place on the Calendar?

MR. SPEAKER:

So ordered.

THE CLERK:

Page 15, third item, Calendar No. 1298, H.B. No. 5048, an Act concerning a mandatory uniform fiscal year for all municipalities.

CARL R. AJELLO, JR.:

Mr. Speaker, may this item be passed temporarily?

MR. SPEAKER:

So ordered.

THE CLERK:

Same page, Calendar No. 1301, H.B. No. 5168, an Act concerning the power of lenders to secure future advancements of money as to complete work and progress in the event of default.

CARL R. AJELLO, JR.:

Mr. Speaker, may this item be passed temporarily?

MR. SPEAKER:

I've heard the conversation from right field. So ordered.

THE CLERK:

Calendar No. 1309, Substitute for H.B. No. 5408, an Act concerning the adoption of a Uniform Model State Administrative Procedure Act.

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DAVID H. NEIDITZ:

Mr. Speaker, I move adoption of the Joint Committee's favorable report and passage of the Bill.

MR. SPEAKER:

Will you remark.

DAVID H. NEIDITZ:

Mr. Speaker, the Clerk has an Amendment, Schedule "A".

MR. SPEAKER:

The Clerk will call House Amendment Schedule "A".

THE CLERK:

House Amendment Schedule "A", offered by Mr. Neiditz, of the 12th, consisting of two pages.

MR. SPEAKER:

Does the gentleman from the 12th wish to outline the Amendment?

DAVID H. NEIDITZ:

Yes. Mr. Speaker, this was an omission. This Amendment was brought down with the Bill, and through an error in the Legislative Commissioner's office, on discovery of it in the file, this Amendment is before us. This Amendment, ironically enough, was requested by all of the people who work in the Legislative Commissioner's office, and it separates the various jobs between the Secretary of the State, the Commission on Legal Publications, the Attorney General, and the Commissioner's office, and it is a satisfactory solution to a very thorny problem. I move its adoption.

MR. SPEAKER:

Question's on adoption of Amendment Schedule "A". Will

EFH

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you remark. If not, all those in favor indicate by saying "aye".  
Opposed. Amendment "A" is adopted.

EFH

DAVID H. NEIDITZ:

Mr. Speaker, H.B. No. 5408, which, as you may remember, we passed in the last Session, and the Senate passed in the last Session, and has been passed before, represents one of the most important pieces of legislation that has come before this body. It'll provide the State of Connecticut, for the first time, with an understandable and comprehensive set of rules to govern administrative agencies, and as you know our administrative agencies, our agencies of State Government, have been given increasing powers...increased powers...over the last few years. The administrative agencies of this State will be required to make public all their regulations and to hold hearings in public before the adoption of new regulations. No longer will the public be kept in the dark as to what the administrative regulations of our State agencies are, since this Bill will require the publication and indexing of all regulations. This Bill is similar to others which have been passed. It has a number of improvements that were not in the Act that we passed in the last Session. The General Assembly, as you know, has for years sought to maintain appropriate control over the acts of State agencies, which, on occasion, sought to change the impact of laws which we passed by passing regulations. The Interim Legislative Review Committee has been the primary tool which we have to exercise that control, which we have all deemed of primary importance. This Bill would preserve that Committee and strengthen it by making it a Standing

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Committee and increasing the number of Members who would serve on it. This, as you all well know, is an equally divided Committee between both parties. It is not the purpose of this Committee to be partisan. It's the purpose of this Committee to see that the legislative intent is carried out. And that it's also important ~~that~~ that no regulation/<sup>could</sup>become effective without approval of this Standing Committee. The Bill also preserves the present right of the Attorney General to review all State regulations...

EFH

MR. SPEAKER:

Representative Neiditz.

DAVID H. NEIDITZ:

...preserves the present right of the Attorney General to review all State regulations for legal sufficiency, and gives him the right to disapprove any regulation which he feels is not in compliance with the laws of this State. A very important part of any Bill which purports to set up a workable set of administrative procedures is to insure that the regulations will be kept up-to-date and available to the public. I'm happy that the Legislative Commissioner's office, the Secretary of the State, and the Commission on Legal Publications all support the scheme proposed in this Bill for publication and supplementing of regulations. Those among you who have had to look in vain for current regulations, both lawyers and non-lawyers, should know henceforth regulations will be published monthly in the Connecticut Law Journal, which, by the way, is available to every Member of this General Assembly upon the simple request of the Commission on Legal Publications free. That's in another Bill, which we passed in the last

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Session. And further, this Commission will publish a regular supplement to the compilation which is now nearing completion in the Secretary of the State's office. Naturally, this Bill also provides for fair and easy Court review of proposed regulations by an aggrieved person, and in many other respects proposes a fine system of administrative procedure. I heartily support this Bill. It goes a great way in helping the little people of this State.

EFH

MR. SPEAKER:

Further remarks on the Bill as amended.

JAMES F. BINGHAM:

Mr. Speaker, Thank you, Mr. Speaker. I can only reiterate what Representative Neiditz has said. I am happy that for the first time a plan for a publication of State regulations, which will keep regulations current and available to the public, has been agreed on by the Secretary of State, the Legislative Commissioners, and the Commission on Legal Publications. We need to have these regulations available, and I support the Amendment and the Bill. It is significant that there was absolutely no opposition in Committee to this Bill, and that it was heartily endorsed by the Connecticut Bar Association, many disinterested persons who have long been confused by the procedures before the various State agencies. I know of many instances where constituents and friends have been confused and kept ignorant of the particular rulings and procedures of administrative agencies in this State. This Bill, by requiring the publication of regulations and procedures which each agency has, will give the people an opportunity to be aware of their rights and how to proceed before the agencies. I feel

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that in a time of increasing complication and administrative red tape it is vital that the people be given an opportunity to make their views known to State agencies before those agencies adopt regulations which will be vitally important and have a substantial impact on the rights of the people of Connecticut. By requiring that hearings be held by any agency before regulations are adopted, amended or repealed, this Bill gives the people the right to be heard...one that is often denied to them today. The Bill provides for notice to public of agencies' intent to make regulations...an opportunity to be heard...compiling and publishing and indexing all agency regulations by the Commission on Legal Publications... and a provision for judicial review...and a right to contest agency rulings. The Bill provides for appeals procedures. Mr. Speaker, I heartily support this Bill, and I urge its adoption.

MR. SPEAKER:

Further remarks on the Bill as amended.

FRANCIS J. COLLINS:

Mr. Speaker, in 1969, a Bill similar to this was adopted, and I supported the Bill at this time, and I believe from the explanation by the distinguished Chairman of the Committee that I would certainly support it this time. However, I am concerned about the fact that he alluded in his discussion that this Bill was vetoed on at least three previous occasions by Governor Dempsey...the last veto being in 1969 of a Bill which had a little bit different title. It concerned the adoption of the first half of the Uniform Model Administrative Procedures Act. I notice that the title is a little bit different here, and I assume now we have

EFH

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the full Act in front of us instead of just half the Act. But I would appreciate it if he could indicate to us what this Act contains. It might overcome apparently the previous objections of the Executive Branch on this particular Bill.

EFH

MR. SPEAKER:

Does the gentleman from the 12th care to respond?

DAVID H. NEIDITZ:

Well, previously, I think in the Amendment makes clear one specific change as far as who does what between the Secretary of the State, the Commission on Legal Publications, the office of the Attorney General. Also, I think the veto message, and I certainly don't say this in a partisan way, talked about placing more paper work on State agencies, and as I said before, two years ago, and four years ago, I put people above paper work. I believe the State can handle it. I believe that we have this under Federal law, ~~under~~ <sup>under</sup> the Federal Administrative Procedure Act, and I believe this is a people's Bill.

MR. SPEAKER:

Further remarks on the Bill.

ALBERT R. WEBBER:

Mr. Speaker, I, too, want to express my heartfelt support for this measure. This is very definitely a people's Bill, and if we have any interest in the welfare of our people, we most certainly should support this Bill and support it unanimously. This Bill gives people, as was said before, the right to be heard, and this is a long overdue right. I would ask all of you to support this Bill and support it with all the vigor at your command.

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Thank you very much.

MR. SPEAKER:

Further remarks.

ROBERT G. OLIVER:

Mr. Speaker, speaking in support of the Bill and the Amendment, I would say that this Bill as drafted now measures well with the Act concerning reorganization of the Court system, which was passed last night in the Senate and will be coming before us shortly, in that it recognizes increased responsibility and authority in the Court of Common Pleas, and in Sections 10 and 18 it provides that appeals and declaratory judgment actions and challenges in the Courts do go to the Court of Common Pleas. I think in this respect it's farsighted, and rare indeed it is that with one Bill we pass measures with another Bill we're considering, and this does it and is indeed a happy occasion. I would say, however, in clarification of Section 18, sub-Section B, where it refers to procedures for review in the Court of Common Pleas for Hartford County, that as I read that Section and sub-Section A, this clearly excludes appeals such as from Unemployment Compensation, where the Federal Act itself provides that the appeal must be taken to the Court of highest general jurisdiction in the Court, which in this case is the Superior Court, and the Bill coming down from us...to us...from the Senate, we specifically exclude Unemployment Compensation appeals, and I believe that nothing is intended in Section 18 to in anyway transgress what we do in the Court Bill and what is required under Federal law. And the same comment I would make with reference to appeals from the Probate Courts,

EFH

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which I believe are not hampered by this Bill in any event.

EFH

HOWARD A. NEWMAN:

Mr. Speaker, I believe merits of the Bill have been fully expounded very eloquently and ably, and I'm not going to go into it again. Suffice it to say that this is not only a good Bill but it's a terrific Bill, and I urge its support by all the Members of the House.

ROBERT D. KING:

If I may, Mr. Speaker, a question to Representative Neiditz, through you. Do I understand from Section 20 of the Bill, Representative Neiditz, that the present regulation that the functions of the present Regulation Review Committee would be eliminated?

MR. SPEAKER:

Representative Neiditz care to respond?

DAVID H. NEIDITZ:

Yes, sir, to my distinguished friend from Tolland. It will not only be retained, it will be strengthened.

ROBERT D. KING:

Now, I don't understand the question...I don't...I mean, I think I understand the question. I don't understand the answer.

MR. SPEAKER:

Does the gentleman care to restate his own question?

ROBERT D. KING:

Under Section 20 of the Bill, is the present Regulation Review Committee eliminated?

DAVID H. NEIDITZ:

It is not, sir. It is retained. It is strengthened.

EFH

Its powers are strengthened. The powers of the legislature for legislative oversight have been strengthened, in the same bipartisan or nonpartisan way that the Committee under the able Chairmanship of Representative Stevens has operated for the last two years.

ROBERT D. KING:

Mr. Speaker, further question through you, Mr. Speaker. Do the powers of the Regulation Review Committee then remain the same as they are now...that they have the authority to overrule and nullify any regulation adopted under this Act?

MR. SPEAKER:

Does the gentleman care to respond?

DAVID H. NEIDITZ:

They do, sir. Yes, sir. Correct, or any part thereof. That's the improvement.

ROBERT D. KING:

Thank you very much.

MR. SPEAKER:

Further remarks before we vote.

THOMAS J. DONNELLY:

Mr. Speaker, addressing myself very briefly to the point raised by Representative King, and speaking...am rising and speaking in favor of the Bill, I think/<sup>that</sup>there is substantial improvement in the present method of legislative oversight of the activities in promulgating and enforcing regulations on the part of some of our executive agencies, which have, from time to time, in the past caused grave concern to our people. Unless I misread the Bill,

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Mr. Speaker, Section 3 specifically provides that before any such regulation may be effective, it must be affirmatively approved by the Legislative Review Committee, which is, I believe, an important strengthening of its function. I urge adoption of the Bill. EFH

MR. SPEAKER:

Are you prepared to vote?

MARILYN PEARSON:

Mr. Speaker, I think this is an excellent piece of legislation, and I'm very happy to see that the Regulation Review Committee will be strengthened. I think this has been a very important...oh, what can I call it...that we've had in the Legislature...a check on the regulations that have been adopted by the various Commissions, and it's given us this authority which we so dearly needed. Section 5 goes into the Legislative Committee's reviewing of regulations, and I would hope that with the passage of this Bill that we would be able to urge every State Commission and Department in the State of Connecticut to adopt regulations. We have one of our State Departments, the Department of Community Affairs, which has refused to adopt regulations, and I would hope through this Bill that the Regulation Review Committee would be able to force them to do this, so that this information could get out to the people of the State of Connecticut. They have been very lacking in this area, and I hope that this will bring some of the right-to-know to the people regarding this particular Department, who has not published any regulations. Thank you.

MR. SPEAKER:

Question's on acceptance and passage as amended by

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Amendment Schedule "A". All those in favor indicate by saying "aye". Opposed. Neiditz' Bill is passed. To the gentleman from the 12th, there was a comment from the floor, "Representative Neiditz represents Justice". The Clerk will continue with the call of the Calendar. EFH

THE CLERK:

Page 16, Calendar No. 1306, Substitute for H.B. No. 5785, an Act concerning School Boards of Education and teacher negotiation, File No. 1495.

JOHN F. PAPANDREA:

Mr. Speaker, may that item be passed temporarily?

MR. SPEAKER:

So ordered.

THE CLERK:

On Page 16, Calendar No. 1313, Substitute for H.B. No. 6198, an Act concerning the licensing of professional engineers.

JOHN F. PAPANDREA:

Mr. Speaker, may that item be passed retaining its place on the Calendar?

MR. SPEAKER:

Without objection, so ordered.

THE CLERK:

On Page 17, the second item, Calendar No. 1318, Substitute for H.B. No. 6408, an Act concerning allocation of certain Sales Tax Receipts to the Connecticut Development Commission.

VICTOR TUDAN:

Mr. Speaker, I move the acceptance of the Joint Committee's

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6.

the Majority and Minority leaders I move that we accept the joint committee Favorable reports. Acceptance and passage of the following bills:

On page two of the Calendar, Cal. 1105, File 1225, Substitute for H.B. 8672 An Act Repealing Provisions made Unnecessary by State Building Code.

On Page 3 of the Calendar, Cal. 1158, File 1651 Substitute for S.B. 463 An Act Concerning Participation by Savings Banks in the Provision of Housing for Connecticut Residents.

On page 4, Cal. 1188, File 1337 Substitute for H.B. 6333 An Act Concerning Payroll Deductions of Insurance Premiums by Public Service Companies.

Same page Cal. 1194, File 1403 H.B. 9253 An Act Validating As Timely the Notice Given by Helen Romanewicz and to That extent Granting Her Permission to Prosecute to Final Effect a Suit Against the Town of Colchester and the Borough of Colchester.

On Page 5, Cal. 1205, File 1715, Substitute for S.B. 41 An Act Concerning Conviction and Sentencing of Girls in Manifest Danger of Falling Into Habits of Vice.

Cal. 1215, File 739, H.B. 7302 An Act Concerning Fire Protection Service at the Southeastern Branch of the University of Connecticut.

Cal. 1216, File 1434 H.B. 7755 An Act Concerning Limitation of Reserve Fund for Fire Districts.

Cal. 1220, File 1424 H.B. 8269 An Concerning the Minimum Corporation Business Tax.

Page 6, Cal. 1227, File 1426 H.B. 8947 An Act Concerning Deferred Terms Regarding Zoning Officials.

Cal. 1243, File 1493 Substitute for H.B. 5408 An Act Concerning the Adoption of a Uniform Model State Administration Procedure Act.

Page 7, Cal. 1244, File 1486 Substitute for H.B. 5609 An Act Concerning the Assessment of Benefits by Sewer Authorities.

**JOINT  
STANDING  
COMMITTEE  
HEARINGS**

**GOVERNMENT  
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GOVERNMENT ADMINISTRATION AND POLICY

THURSDAY

MARCH 25, 1971

Senator William J. Sullivan  
Representative David Neiditz, Presiding

Members present: Senator William J. Sullivan  
Representatives: Robert Bruno, William Ryan,  
Elmer Mortensen, Sarah Francis Curtis,  
Vincent Gagliardi, Albert Crockett, Davis Neiditz,  
T.J. Donnelly, Frank M. Reinhold, Arthur Della Vecchia,  
Hilda Clarke

Chairman Neiditz: Good afternoon, this is a hearing on House Bills 5408, S.B. 1218 and S.B. 747, they all deal with the general same subject matter, the adoption of a model state administrative procedure act. We have a speakers' list; Mr. Frauenhofer.

Victor H. Frauenhofer: My name is Victor H. Frauenhofer, I'm Vice-president of finance of Conn. Natural Gas Corporation which has its headquarters at 233 Pearl St., Hartford, Conn. The company has franchises to sell natural gas to 100,000 customers in the cities of Hartford and New Britain and twenty four other towns and cities in central Conn. I am appearing today in support of House Bill 5408, which is an act concerning the adoption of a uniform model state procedure act introduced by Rep. Neiditz. As a public utility my company, along with the other utilities in the State of Conn., is one of the most regulated business entities in the state. We have no quarrel or complaint with the regulation of utilities. Indeed, we believe that fair and equitable regulation of utilities by the state can result in providing needed services to the public at a just price. However, since our mandate is to serve the public and because we are not subject to the ordinary competitive influences of the market place, we strongly believe that the regulations imposed upon us, and other utilities, should be uniform, equitable and afford procedural due process to all involved. We have found by experience that it is not uncommon for a commission to cite a "rule" that exists only in their files from a previous case which is unreported, unpublished and unindexed. Failure to follow this rule results in an admonishment and frequently an unfavorable ruling. Hearings are largely ex parte affairs in which evidence is unilaterally presented to the commission which thereafter, in closed-door session, hears rebutting evidence from counsel to the commission. There is no opportunity to argue, clarify or in turn rebut this evidence which is presented in executive session. From this proceeding an order issues, which by law we just either obey or seek redress in the costly and timeconsuming appellate procedures of the court. We welcome H.B. 5408 as an effort to bring some order to the present chaos that pervades our regulatory agencies. We are particularly pleased to note that this Bill requires the promulgation

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Victor H.  
Frauenhofer:

of rules of practice and rules of policy of the commissions. Hopefully, a compilation of such rules will at least be a starting point for entering into the administrative thicket. Since under the bill these regulations would have to be compiled and indexed by the Secretary of the State, there would be at least a central list of all rules concerning the commissions. We further noted that in contested cases, the bill contains a procedure so that both sides are advised of the nature of the proceeding and given adequate notice of each other's position. We are particularly pleased to note that the bill requires that all staff memoranda submitted to a particular agency must be made a part of the record. In speaking in support of H.B. 5408, we do so not only as a highly regulated company but also as a member of the public. Governmental red tape, applied with sufficient dexterity, can thwart the rights of all citizens. We believe this bill is an important step not only in unsnarling that tape but to a great degree in eliminating it altogether.

Chm. Neiditz: Thank you very much. Neal Ossen.

Neal Ossen: Neal Ossen, an Attorney with Neighborhood Legal Services in Hartford, Conn. and I'd just like to say that in my practice of law I've dealt with perhaps every state agency in the State of Conn. and any attorney who has to deal with the state agencies goes, the expression is, "Blippo". One, he can't find rules and regulations; he begs, borrows, steals, if he can find them he's forced to look in many cases, in the law journal to discover that whatever a rule or regulation cited has never been published. I make particular reference to the welfare department which has, I'd say, close to 4,000 pages of what they call a manual, but then at one stage there's a rule and regulation and another stage it's not a rule and regulation, but just internal workings, but they don't publish things. The only criticism I have of the bill introduced by Rep. Neiditz is that it doesn't make mandatory a rule making body to hold hearings when somebody proposes a regulation. I make particular reference to the struggles of Neighborhood Legal Services to convince the Public Utilities Commission to adopt certain rules which we feel are in the interest of the poor people. And they say we don't have to do it if we take it under advisement. I think that this committee ought to see that if somebody makes a request of the commission, that the commission at least offer for the public comment a proposed rule as introduced by some member of the public. I'd just like to say that this committee is aware of the history of this bill and how it was passed at the last session of the legislature and vetoed. For an attorney who practices it is inconceivable to me that this state, to this date, has not had a unified body of law in regard to what's been called by

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- Neal Ossen: most people as the 5th estate, the administrative bodies. I think this bill goes a great way in protecting the rights of the people; it certainly, if people of this state read something that breaks down and protects the person from the rule maker and the judge, certainly this bill goes a long way in separating that person that decides the case from also being part of the investigatory stage and the adjudicatory stage. I think this bill will prohibit what was said by a court in a case in which the hearing officer was nothing more than a rubber stamp for the Commissioner, and if that's what we have now, then this bill will protect it. I urge that this committee favorably report the bill out.
- Chm. Weiditz: Thank you Mr. Ossen. Mr. Hartigan.
- Robert Hartigan: Mr. Chairman, members of the Committee, my name is Robert Hartigan, I'm appearing before you in behalf of Northeast Utilities and Algonquin Gas Transmission Company. Actually I had not planned to present any arguments to this committee, but to listen to what transpired, but seeing so few advocates of this legislation I decided I should add a few thoughts. I have long been interested in an Administrative procedures act, primarily in my capacity as a member of the Administrative law committee of the Connecticut Bar Association. We have endeavored in the past to have this legislature adopt bills such as the three before you this morning and as a matter of fact were successful in one year, but I believe it was - in one session - it was vetoed by Governor Dempsey. Our feelings about this type of legislation is briefly that it's long overdue; that the administrative bodies of this state do conduct their hearings in a somewhat imprecise manner; that the record is often much longer than it should be because of the failure of the commissions to discipline the parties in terms of relevance to the testimony, etc. I personally believe, and I know it is the view of my clients whom I represent that such a bill, any one of these three, and unfortunately I am unable to tell you what my preference is because I haven't analyzed them closely, but I think they - all three of them, it's my understanding, crack rather closely with the uniform administrative procedures act and I do think that this would be a step forward in the conduct of the business of the State of Conn. if our administrative agencies followed uniform rules such as could be thrust upon them by this sort of bill.
- Chm. Weiditz: Mr. Breetz, Counsel for Committee.
- Mr. Breetz: Mr. Hartigan, my name is Bill Breetz, and I'm on the faculty up at the Law School and I'm Counsel for the Committee. The primary difference between the two bills on the one hand and the third one we have is that 5408 adopts language precisely of the revised model state act which uses the word "rule" and the other two change the word "rule" to the word

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- Mr. Breetz: "regulation" so instead of adopting rules for example, the agencies are required to adopt regulations. Now somewhere in the dim, dark, past of my mind, there's a reason for that, which I think arises out of judicial interpretation of those words in this State and I'm hoping that a man of your eminence might know the difference when I don't.
- Mr. Hartigan: Thank you, but you embarrass me, I don't know either. I'll take a stab at it, I think a regulation must be adopted through certain formalities in terms of publishing, well they have to hold a hearing on it if I recall and then it has to be published in the Conn. Law Journal, then it goes into effect at a certain time, and ultimately I think regulations have to be stamped by the legislature in a successive session; also I think the interim committee of legislature has something to do with regulations. Now rules I think are less formal and can be adopted and merely made acceptable to parties perhaps; this is, I'm trying to rationalize it without really knowing.
- Chm. Weiditz: Thank you. Mr. Lemaire
- Leon Lemaire: I'm Leon Lemaire and I'm speaking for the Connecticut Business and Industry Association. I might mention that we are a merger of the former Chamber of Commerce, that is State Chamber of Commerce and the Manufacturers Association of Conn. We have a combined membership right now of about 3,000 employers in the State of Conn. Our people are constantly exposed to the enforcement agencies particularly in the Labor dept., Health Dept., various independent commissions, water resources, etc. and they have been operating in the past as has been pointed out by previous speakers on an Ad Hoc basis, sort of operating out of the back of their pockets on what they want to do with regard to rules or policy statements. It recently was called to my attention that the Labor Dept. including the security division told its local offices to grant unemployment benefits, just to use as an example here, to persons who followed their husbands, to wives who followed their husbands. Now the case in point is this, an employee was transferred, let's say, from Torrington to Bridgeport and the wife followed. Under the statutes as they have been interpreted up until now, the wife voluntarily would have left her job in Torrington to go to Bridgeport. Through a simple memorandum, a letter, to the local offices, it was determined that the wife should receive unemployment compensation without any penalty period whatsoever. The law says that when you leave a job you are disqualified for four weeks, so what I'm suggesting is, I'm just giving you an example of the kind of thing, the kind of ruling that is issued, which cost people money by the way, because the employer was charged here, and forced the employer to go to court. The case is now pending in the courts. I think that either or any one of these bills are

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Leon Lemaire: good bills and ought to be adopted, and I certainly will do everything that we can as an association to see to it that the Governor signs it this time, because I think it's long overdue. With regard to the question of rule vs. regulation, I would like to see the word regulation used rather than the word rule, because I think we're used to it, it's a word which is frequently used in the statutes and is generally what we talk about as having the force and effect of law, so I think that the word regulation means something here in the State of Conn. more so than it might in some other states or at the Federal level. Rules at the Federal level have the force and effect of law, as well. Regulations, this is my understanding anyway, regulations in the State of Conn. have the force and effect of law so I would suggest that if the House Bill is reported out that you do change the word to regulation.

Chm. Neiditz: Thank you Mr. Lemaire. Is there anyone else who wishes to be heard in favor or opposed to the bill? If not, I declare the hearing closed.