CLIENT ALERT: Connecticut 2026 Employment Law Updates

Employers with Connecticut employees should take note of recently enacted Connecticut employment law changes that will take effect on October 1, 2026. These changes include new pay transparency and pay code disclosure requirements, disability accommodation notices, and expanded lactation break times, bringing new compliance obligations and workplace considerations.

Expanded Pay Transparency Requirements

Connecticut's Public Act 26-12 expands the existing pay disclosure obligations for Connecticut employers, who have been required since 2021 to disclose the wage or wage range for a position to applicants and employees in certain circumstances. Effective October 1, 2026, employers will also need to disclose the wage range, as well as a description of benefits offered, in any internal or external job postings. In addition, Connecticut employers must now provide the wage range and a general description of benefits in the following situations for current employees:

- Upon hiring the employee;
- Upon a change in the employee's position; and
- Upon the employee's first request for a wage range.

The "wage range" is the range of hourly pay or salary the employer sets in good faith for a position. The wage range may include reference to any applicable pay scale, previously determined range of wages for the position, actual range of wages for those employees currently holding comparable positions or the employer's budgeted amount for the position.

Benefits to be disclosed include health insurance benefits, retirement benefits, fringe benefits, paid leave, and any other compensation other than wages offered with a position. If a description of benefits offered is not included in a job posting, employers must provide such information to an applicant either upon the applicant's request or prior to any discussion or offer of compensation with an applicant, whichever comes first.

These requirements apply to any position that is or will be performed within Connecticut or reports directly to a supervisor or office within Connecticut. Employers are prohibited from discriminating or retaliating against applicants or employees for exercising their rights under this law.

New Pay Code Disclosures

Also effective October 1, 2026, Connecticut employers with at least 100 employees must create a guide for pay codes for overtime and the employer's most common pay differentials, such as shift differentials, on-call pay, hazard pay, holiday or weekend pay, and more. The guide must include at least 10 pay codes and the contact information of the office or individual who handles employee disputes on the calculation of hours or pay differentials. Employers must update the guide each time a new pay code is added for overtime or any pay differentials.

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Employers are not required to establish new pay codes in order to comply with the statute, nor are they required to create an internal website if they do not already have one. However, if employers have a website, the guide must be posted on the employer's website in English, Spanish, and the other most common language of their employees. The website address to the guide must be provided to employees upon hire and on each record of hours worked.

Employers may also comply with the law by providing a written copy of the guide to an employee upon hire both in English and the employee's primary language, or by using a third-party payroll services company that provides a guide of the pay codes.

Disability Accommodation Notices

Beginning October 1, 2026, employers must provide written notice of an employee's right to reasonable accommodations for a disability to new employees upon hire, to current employees within 120 days of the effective date (i.e., by January 29, 2027), and to employees who notify employers of their disability within 10 days of notification.

To meet these requirements, employers may display the Connecticut Labor Commissioner's poster in a conspicuous place at the employer's place of business that is accessible to employees. The official poster has not yet been released but is expected to prior to the effective date on October 1, 2026.

Amendment to Workplace Accommodations for Lactation

The Connecticut legislature amended the existing mandate for break times for employees to breastfeed or express breast milk. As of October 1, 2026, Connecticut employers must provide employees with reasonable break times to express breast milk or to breastfeed on site *in addition to* the employee's scheduled breaks as required by current law.

Employers should also consider their obligations to provide breaks and accommodations for lactation under the federal Pregnant Workers' Fairness Act and PUMP for Nursing Mothers Act.

Next Steps

Employers with Connecticut-based employees should review and update their policies and practices related to pay transparency, pay code disclosure, and accommodations, and ensure key personnel are informed of and trained on these changes. Should you have any questions about Connecticut employment policies, please contact your MBJ attorney.

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This alert was prepared on September 9, 2026.

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