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CONNECTICUT SUPREME COURT ISSUES KEY WAGE AND HOUR DECISION IN *DEL RIO V. AMAZON*

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On February 10, 2026, the Connecticut Supreme Court decided *Del Rio v. Amazon.com Services, Inc.*, a putative class action lawsuit with significant wage and hour implications for Connecticut employers.

BACKGROUND

The plaintiffs in *Del Rio*, current or former employees of Amazon, alleged that Amazon failed to compensate them for time spent undergoing mandatory security screenings before leaving Amazon's premises at the end of their shifts. Following the plaintiffs' claims being removed to federal court, the United States District Court for the District of Connecticut granted summary judgment for Amazon. The district court construed Connecticut's wage laws as coextensive with the Fair Labor Standards Act ("FLSA"), which has been interpreted by the United States Supreme Court in *Integrity Staffing Solutions, Inc. v. Busk* to exclude time waiting for security screenings. In reviewing the district court's judgment, the Second Circuit certified two questions of law to the Connecticut Supreme Court: (1) whether time that an employer requires its employees to spend undergoing mandatory security screenings on employer's premises is compensable as "hours worked" under Connecticut wage laws; and (2) whether Connecticut wage laws incorporate a de minimis exception to compensability similar to the federal exception.

HOLDING

In a unanimous decision penned by Justice Ecker, the Connecticut Supreme Court held that Connecticut wage laws are more protective than federal wage laws insofar as they require Connecticut employers to compensate employees for time spent undergoing mandatory security screenings on the employer's premises. The Court emphasized that under the plain and unambiguous language of § 31-76b(2)(A), Connecticut employers are required to compensate employees for all "hours worked" which encompasses any period of time that the employer requires the employee to be on its premises. In broadly interpreting the definition of "hours worked," the Court concluded that "compensability does not depend on whether an employee's time is spent doing work if the employer requires the employee to remain on the employer's premises."

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In addition to broadly construing Connecticut's wage laws, the Court rejected a de minimis exception under Connecticut law. The Court reasoned that no such exception is articulated by statute, regulation, or judicial precedent, and that a de minimis exception would contravene the statutory requirement that employees be compensated for all "hours worked."

IMPLICATIONS FOR CONNECTICUT EMPLOYERS

Connecticut employers should carefully evaluate their wage and hour policies and revise if needed to ensure that employees are compensated for mandatory time spent pre-shift and post-shift on the employer's premises. To ensure compliance, employers must implement time-keeping systems that compensate employees for all hours of work, including time spent undergoing mandatory security screening and other controlled exit procedures. This may involve configuring time-keeping systems to closely align with employees' exit from the employer's premises.

This alert is for informational purposes only and is not intended to be construed or used as legal advice. Wiggin and Dana's Labor, Employment and Benefits Practice Group will continue to provide briefings with material employment-based immigration case updates. If you have any questions, please contact the practice group leader, Lawrence Peikes, at 203.363.7609 or lpeikes@wiggin.com.