

Appendix I – Conflict of Interest Policy and Statement

General Principles

The OHS Technical Team seeks to avoid any conflict of interest in its recommendations and, where possible, to avoid even the appearance of a conflict. The members of the Technical Team understand that, as an advisory body of OHS, Technical Team members are expected to maintain a commitment to transparency and integrity of their work.

The input OHS receives from the Technical Team will inform the development of health policy intended to benefit all within the State. While Technical Team members may benefit from their work as a resident of the State, this policy is not intended to address those situations where Members may benefit from a decision simply because they are a resident of CT. Instead, this policy is designed to address situations where a board or committee member has a specific or individualized interest which may impact his/her ability to participate in Technical Team activities in a neutral, transparent and unbiased manner.

Taking into consideration the above principles, individuals covered by this policy agree that they will not participate in any Technical Team recommendation that materially benefits them or a related party.

All individuals covered by this policy also agree to disclose any interest they have in a matter being considered by the Technical Team where that interest could reasonably be viewed by others as affecting the objectivity or independence of the covered individual. An insubstantial interest will not normally be viewed as affecting the objectivity or independence of the covered individual. However, in the interest of full disclosure, an insubstantial interest should be disclosed to OHS.

Conflict of Interest Policy for Technical Team Members

For purposes of this policy, Technical Team members are considered to have a conflict if the conflict defined under the policy is one of self or a related party to self. For the purposes of this policy, a related party is any:

- Immediate family member (children, grandchildren, parents, siblings and spouses thereof and spouses);
- Household member (persons residing in a Member's household); or
- Organization with which an immediate family member or household member has a formal relationship. A formal relationship is defined as serving as a member, director, officer, employer or partner of an organization regardless of whether the organization is a business or nonprofit.

Determining the Existence of a Conflict of Interest “Conflicts of Interest”

Generally defined “Conflicts of interest” includes not only individual financial gain in conflict with an individual's duties to the Technical Team (“material conflict”) but also conflicts arising from any interest in or duty to another organization. In general, individuals shall not seek to profit personally from their affiliations with the Technical Team or favor the interests of themselves, relatives, friends, supporters, or other organizations over the interests of the Technical Team, or bring their interests into conflict or competition with the interests of the Technical Team.

Recognizing that not all conflict of interest situations are clear-cut and easy to define, it is ultimately the responsibility of each individual to use sound judgment and avoid or determine the existence of and disclose any situation that creates or appears to create a conflict of interest. Specific questions about the possible presence of a conflict of interest shall be directed to OHS' General Counsel, Antony Casagrande (antony.casagrande@ct.gov). Alternatively, the Member may choose to treat the issue as a conflict of interest in accordance with this policy.

Examples

This section includes illustrative examples of what does and does not constitute a conflict of interest that would need to be disclosed under this policy.

1. A Member works for a consulting firm which the Technical Team is considering recommending to the state. The Member has a material conflict of interest with respect to that issue that needs to be disclosed.
2. A Member's employer organization is subject to the Cost Growth Benchmark, and the member's salary is subject to the organization's performance against the benchmark. The Member has a material conflict of interest with respect to the grant decisions that needs to be disclosed.
3. Member has a non-material conflict of interest with respect to award decisions that needs to be disclosed.

Other Conflicts of Interest

When a matter presents a non-material conflict of interest for individuals covered by this policy, the following procedure must be followed unless a more specific procedure is outlined above: a) The Member involved identifies the potential conflict to OHS; b) The Member fully discloses all facts relevant to the Technical Team's discussion of the matter; c) The member refrains from voting on the matter and, if requested by OHS, absents him or herself from the meeting during any discussion of the matter; and d) The disclosure of the conflict and recusal from the vote is documented in meeting minutes and/or other records.

Technical Team Members are under a continuing obligation to report any actual or potential conflicts of interest and must report promptly any conflicts of interest that have not been previously disclosed including material or non-material conflicts of interest requiring disclosure under this policy.

If an individual has reasonable cause to believe that others have failed to disclose a conflict of interest, he/she shall inform OHS' general counsel. The Commissioner shall discuss the issue with OHS' general counsel to assist in determining the appropriate steps to protect the Technical Team.

Certificate

The undersigned hereby certifies that he or she has read and understood this Conflict of Interest Policy and agrees to abide by it.

Signature

Date

Print Name