

Connecticut Department of Social Services
Medicaid Care Advisory Committee
Beneficiary Advisory Council

Conflict of Interest Policy and Statement

This Conflict of Interest Policy sets forth expectations relating to the ethical conduct of those individuals who have been appointed to the Medical Care Advisory Committee and/or Beneficial Advisory Council (“MAC” and/or “BAC”) in order to volunteer their time to advise the Department of Social Services (“DSS”) on its administration of Connecticut’s Medicaid Program.

Although the State of Connecticut Code of Ethics for Public Officials does not technically apply to members of the MAC and/or BAC because they are “members of an advisory board,” and outside of the definition of “public officials,” all MAC and/or BAC members nevertheless have an obligation to further DSS’ goals, and work on behalf of DSS’ best interests. In so doing, by choosing to participate in MAC and/or BAC, members of the MAC and/or BAC must agree to comply with the following ethical standards:

1. An individual has an interest that is in substantial conflict with the proper discharge of the person’s duties and responsibilities to the MAC and/or BAC if the individual has reason to believe or expect that the person, a spouse, a dependent child, or a business with which the person is associated will derive a direct monetary gain or suffer a direct monetary loss, as the case may be, by reason of the individual’s activity on the MAC and/or BAC .. An individual does not have an interest that is in substantial conflict with the proper discharge of duties and responsibilities if any benefit or detriment accrues to the person, a spouse, a dependent child, or a business with which the person, a spouse or such dependent child is associated as a member of a profession, occupation or group to no greater extent than any other member of profession, occupation, or group. If a member of the MAC and/or BAC has a substantial conflict, the member may not take official action on the matter. (Compare to Conn. Gen. Stat. § 1-85).
2. An individual on the MAC and/or BAC who, in the discharge of the person’s duties and responsibilities to the MAC and/or BAC, would be required to take an action that would affect a financial interest of the person, a spouse, parent, sibling, child or the spouse of a child or a business with which the person associated, and that interest is shared by other members of one’s profession, occupation, or group, then the member of the MAC and/or BAC has a potential conflict of interest, except if the interest is of a de minimal nature (loss or gain of less than \$100 per person per year), or is not distinct from that of a substantial segment of the general public (greater than one’s profession, occupation, or group, and consistent with the commonly understood usage of the term; a considerable or large part of the general public, e.g., all licensed drivers, all homeowners, all parents). (Compared to Conn. Gen. Stat. § 1-86).

3. If a member of the MAC and/or BAC believes there is a potential conflict of interest, the member should either excuse from the matter or prepare a written statement describing the matter requiring action and the nature of the potential conflict and explaining why, despite the potential conflict, the person is able to vote and otherwise participate fairly, objectively and in the public interest. The member should provide a copy of the written statement to the designated DSS representative before taking any action on the potential conflict.
4. Members of the MAC and/or BAC should avoid acceptance of employment, contract(s), ownership interest(s) and/or appointment(s) that will impair independence of judgment as to official duties or require or induce disclosure of confidential information that is gained by participation on the MAC and/or BAC, and should avoid acceptance of anything of value based on an understanding that one's official actions will be influenced by the employment, contract, ownership interest, and/or appointment.
5. Members of the MAC and/or shall not disclose to the public, nor use for purposes other than their participation on the MAC and/or BAC, any documents, nor the contents of any documents, that are marked as "confidential" or "proprietary," and that they receive from DSS or its contractor in their capacity as members of the MAC and/or BAC. This includes, but is not limited to, information and documents concerning comparative pharmaceutical pricing or rebate information supplied to members of the MAC and/or by DSS or its contractor or any other proprietary or confidential information.

Attestation and Signature

I acknowledge that I have read and understand the Conflict of Interest Policy for the Medical Care Advisory Committee and Beneficiary Advisory Council. I agree that by choosing to participate as a member of the Medical Care Advisory Committee and Beneficiary Council, I agree to comply with this policy.

Signature

Date

Print Name