

Connecticut Department of Social Services
Pharmaceutical and Therapeutics Committee

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 Pharmaceutical and Therapeutics (“P&T”) Committee and who volunteer their time to advise the Department of Social Services (“DSS”) on matters concerning a Preferred Drug List and prior authorization for medications in government benefit programs.

Although the Code of Ethics for Public Officials does not technically apply to members of the P&T Committee because they are “members of an advisory board,” and outside of the definition of “public officials,” all P&T Committee members nevertheless have an obligation to further DSS’ goals, and work on behalf of DSS’ best interests. In so doing, members of the P&T Committee must be aware of the following ethical standards:

1. An individual has an interest that is in substantial conflict with the proper discharge of his or her duties and responsibilities to the P&T Committee if the individual has reason to believe or expect that he or she, a spouse, a dependent child, or a business with which he or she is associated will derive a direct monetary gain or suffer a direct monetary loss, as the case may be, by reason of his or her activity on the P&T Committee. 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 him or her, a spouse, a dependent child, or a business with which he or she, 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 P&T Committee has a substantial conflict, the member may not take official action on the matter. (Conn. Gen. Stat. § 1-85).

For example, a state employee who is required, in the course of his or her official duties, to determine whether a consulting contract should be awarded to his or her spouse, has a substantial conflict and may not take official action on the matter.

2. An individual on the P&T Committee who, in the discharge of his or her duties and responsibilities to the P&T Committee, would be required to take an action that would affect a financial interest of himself or herself, a spouse, parent, brother, sister, child or the spouse of a child or a business with which he or she is associated, and that interest is shared by other members of one’s profession, occupation, or group, then the member of the P&T Committee has a potential conflict of interest, except if the interest is of a de minimus nature (loss or gain of less than one hundred dollars 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). (Conn. Gen. Stat. § 1-86).

3. If a member of the P&T Committee believes there is a potential conflict of interest, the member should either excuse himself or herself 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, he or she 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 DSS representative.
4. Members of the P&T Committee should avoid acceptance of outside employment 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 P&T Committee, and should avoid acceptance of anything of value based on an understanding that one's official actions will be influenced by this.
5. Members of the P&T Committee shall not disclose to the public, nor use for purposes other than their participation on the P&T Committee, any documents, nor the contents of any documents, that are marked as "confidential" or "proprietary," and that they receive from DSS or its contracted vendor in their capacity as members of the P&T Committee. This includes, but is not limited to, information and documents concerning comparative pharmaceutical pricing or rebate information supplied to members of the P&T Committee by DSS or its contracted vendor.

I acknowledge that I have read and understand the Conflict of Interest Policy for the P&T Committee.

Signature

Date

Printed Name