



STATE OF CONNECTICUT

DEPARTMENT OF SOCIAL SERVICES

OFFICE OF LEGAL COUNSEL, REGULATIONS, AND ADMINISTRATIVE HEARINGS
55 FARMINGTON AVENUE • HARTFORD, CONNECTICUT 06105

DEPARTMENT OF SOCIAL SERVICES ETHICS POLICY

All DSS employees shall comply with the Code of Ethics for Public Officials (“Code”) (Conn. Gen. Stat. §§ 1-79 through 1-90a; Conn. Agencies Regs. §§ 1-81-1 to 1-81-39) and all applicable federal, state, and professional rules of conduct. All employees shall take annual web-based Ethics Training, offered through the Office of Organizational & Skills Development (“OSD”).

Definitions: Please see the Code and its regulations for relevant terms and definitions. Conn. Gen. Stat. §§ 1-79.

Application of the Policy:

I. Code of Ethics

All employees shall read and familiarize themselves with the Code, which can be found on the Office of State Ethics (“OSE”) website at [Connecticut Office of State Ethics](#). Employees also should refer to OSE’s publication, available online, [Public-Officials-and-State-Employees-Guide-Rev-November-2021.pdf \(ct.gov\)](#). Although employees are expected to be familiar with and abide by the entire Code, please find frequently utilized provisions of the Code for your review:

a. Gifts

A gift is defined as anything of value for which consideration of equal or greater value is not paid. In general, an employee shall not:

- Exchange gifts valued at \$100 or greater with supervisors or subordinates. (No limitation applies to coworkers who are not in a supervisor-subordinate relationship.);
- Accept or solicit a gift on account of the employee’s position with DSS or in exchange or consideration for the employee taking official action; or
- Accept or solicit a gift from restricted donors, which include:
 - Registered lobbyists or representatives of registered lobbyists;
 - Individuals or entities doing or seeking to do business with DSS, i.e., vendors;
 - Individuals or entities engaged in activities regulated by DSS; and
 - Contractors pre-qualified by the Department of Administrative Services.

There are numerous exceptions to these general rules regarding accepting gifts, such as when receiving token items, the offer of food or beverage, and gifts in honor of major life events. Conn. Gen. Stat. §1-79(5)(A)-(S). Because the exceptions to the gift rules are detailed and specific, please consult with the DSS Ethics Liaison and/or the Code when accepting or soliciting a gift.

b. Necessary Expenses

An employee may not accept any fee or honorarium for an article, speech, appearance, or participation in an event in his or her official capacity. If an employee is actively participating in an event in his or her official capacity, i.e., giving a speech or running a workshop, he or she may accept reimbursement for necessary expenses associated with such activity, i.e., travel, lodging, meals, and related conference or seminar expenses. If reimbursement is accepted for lodging and/or out-of-state travel, the employee must file a report of such expenses with OSE within 30 days of receiving payment, using OSE's [FORM ETH-NE – NECESSARY EXPENSES / FORM ETH-GTS – GIFTS TO THE STATE \(ct.gov\)](#).

c. Conflicts of Interest

If an employee's official action will result in direct monetary gain or loss for the employee or his or her spouse, child or a business with which the employee is associated, the employee has a substantial conflict of interest and must abstain from taking the official action.

If an employee, in the course of his or her official duties, would be required to take action that would affect, directly or indirectly, the employee's own financial interest or that of his or her spouse, child, child's spouse, parent, sibling, or a business with which the employee is associated, the employee has a potential conflict of interest and must notify his or her supervisor, in writing, to request reassignment.

d. Outside Employment

Generally, an employee is permitted to hold a paying job outside of employment with DSS. The Code strictly prohibits an employee from the following outside employment:

- Accepting outside employment that impairs his or her independence of judgment regarding his or her state duties or encourages the employee to disclose confidential information learned on the job;
- Engaging in outside employment which is in substantial conflict with the proper discharge of his or her duties or employment in the public interest;
- Disclosing for financial gain any confidential information acquired in the course of employment with DSS;
- Using his or her official position for personal financial gain, or the gain of a spouse, child, child's spouse, parent, sibling, or an associated business;

- Utilizing state time, materials, resources, or personnel in connection with outside employment;
- Employing his or her supervisor or subordinate in the employee's outside business; and
- Accepting employment for appearing, agreeing to appear, or taking any other action on behalf of another person before any of the following agencies:
 - Department of Banking;
 - Claims Commissioner;
 - Office of Health Care Access, Department of Public Health;
 - Insurance Department;
 - Department of Consumer Protection;
 - Department of Motor Vehicles;
 - State Insurance and Risk Management Board;
 - Department of Energy and Environmental Protection;
 - Public Utilities Regulatory Authority;
 - Connecticut Siting Council; and
 - Connecticut Real Estate Commission.

Prior to accepting employment that may implicate the above-outlined prohibitions of the Code, an employee must notify, in writing, the DSS Ethics Liaison of such prospective activity. The written notification will provide an opportunity for further review by DSS officials and/or OSE of the degree of potential conflict of interest, if any, and permit appropriate actions, where necessary. An employee may be asked to sign a statement indicating that he or she has communicated with either the DSS Ethics Liaison or OSE and that there is no violation of the Code.

e. Post-Employment

After leaving employment with DSS, a former employee may never: (1) disclose any confidential information learned during the course of employment with DSS; or (2) represent anyone (other than the state) regarding a particular matter in which the former employee was personally or substantially involved while employed at DSS.

Additionally, for a period of one year following employment with DSS, a former employee may not: (1) represent a new employer before DSS; or (2) be hired by a party to a state contract that is valued at \$50,000 or more and was signed within the employee's last year of service, if the former employee was involved in or supervised the contract negotiation or award.

f. Statements of Financial Interest

Managers and certain employees involved in the contracting process are required to file a statement of financial interest ("SFI") annually. These employees are identified by the Commissioner, in accordance with the Governor's guidelines, and will be notified annually of their responsibility to file an SFI.

For those employees who have been identified, SFIs must be filed with OSE by May 1st of each year using OSE's [Office of State Ethics - Statement of Financial Interests \(ct.gov\)](#). Failure to file on time can result

in a penalty of \$10 per day for each day the SFI is late. Additional information about SFI filing is available on the [Connecticut Office of State Ethics](#) and from the DSS Ethics Liaison.

II. Professional Rules of Conduct

The conduct of certain DSS employees and officials, such as social work, medical, and legal staff, may be subject to ethical rules and rules of conduct particular to their professions. All such employees are responsible for their individual compliance with the rules of their professions and must maintain themselves in good standing with all relevant regulatory and licensing authorities. Employees should consult with the DSS Ethics Liaison in the event that any professional rule of conduct conflicts with the requirements of the Code.

Consequences of Failure to Comply:

An employee may be subject to agency disciplinary action, up to and including termination from employment, for failure to comply with the Code and this policy. Additionally, the OSE may refer violations of the Code to the Chief State's Attorney for criminal prosecution.

For Further Guidance:

The DSS Ethics Liaison, Michaela Rosenberger of the Office of Legal Counsel, Regulations & Administrative Hearings, is available to answer any ethics-related questions and can be reached at (860) 424-5504, Michaela.Rosenberger@ct.gov, or in Central Office. Also, employees may contact the Office of State Ethics directly (860) 263-2400 or ose@ct.gov with questions regarding the Code.