

Conflict of interest safeguards for the Social Innovation Model Initiative

WHEREAS, The SIM initiative will provide a mechanism for funding a broad array of reforms that may directly or indirectly benefit consumers and providers throughout Connecticut. While many reforms and initiatives have been proposed, it is not known today all the initiatives that may be undertaken or what additional funds may become available to support SIM related work;

WHEREAS, It is in the best interest of the State and the SIM initiative to enable broad-based and diverse stakeholder input through its governance structure, which is comprised of a wide variety of advisory bodies, including but not limited to the Healthcare Innovation Steering Committee ("HISC"); and

WHEREAS, The State acknowledges that members of these advisory bodies, or the organizations they represent, may at some point wish to be participants in or beneficiaries of one of the many initiatives that the SIM PMO will undertake, and that this may represent a potential conflict of interest.

NOW THEREFORE BE IT RESOLVED, that the following proposed protocol is intended to guard against such potential conflicts:

1. The advisory bodies will not have a direct role in managing resources, financing initiatives or making funding award decisions.
2. All procurements pertaining to SIM related initiatives will be undertaken by the state, primarily through the SIM Program Management Office ("PMO") or through state agencies, and will not be undertaken by advisory bodies.
3. If the SIM PMO requests advice from an advisory body regarding the allocation of resources to support an initiative, it is the duty of the members of that body who have, or whose organizations have an actual, perceived or potential financial interest in the matter to disclose that information to the advisory body immediately. At that time the member has the option of recusing himself/herself. If the member does not ask to be recused from the discussion, then the advisory body will immediately determine if a conflict or potential conflict of interest exists. If so, the member who could directly benefit from such decisions or whose organization would directly benefit will be asked by the advisory committee chair(s), after the committee's discussion, to recuse himself/herself from participating in the discussion regarding the item in question. A member does not have a conflict of interest if there is an actual, perceived or potential financial benefit (or detriment) to the member or the member's organization that is no greater than that of the member's or the member's organization's profession, occupation or group; i.e., no conflict exists if the member's or member's organization's potential benefit (or detriment) is not distinct from that of a substantial segment of the general public.
4. Members of the advisory bodies may participate in program design and development decisions, even if they or their organizations may potentially reap a benefit (or detriment) from such programs with the proviso that:

- a. The deliberations of the advisory bodies regarding such program design and development decisions are public,
 - b. Materials prepared to support such deliberations and meeting summaries are published on the SIM website at www.healthreform.ct.gov and available to members of the public without restriction,
 - c. The member discloses the member's or the member's organization's actual, perceived or potential financial in such program design or development decisions as described in paragraph 3, above, and
 - d. The member or the member's organization does not have a conflict of interest as defined in paragraph 3 above.
5. At such time that the state determines to proceed with a procurement, the state will prepare and undertake such procurements in accordance with the state's procurement guidelines. The preparation of the procurement materials and the conduct of the selection of a successful bidder(s) will be strictly confidential until such time as the procurement documents become part of the public record. The SIM advisory bodies will not participate in such procurements nor have access to information pertaining to a procurement, while such procurement is in process.
6. The state may, in its procurement process, include state agency personnel as well as outside stakeholders, including stakeholders that may be members of a SIM advisory body. However, such participants will be required to sign a confidentiality and conflict of interest statement that provides assurances that participants do not have any interest that substantially conflicts with the proper discharge of their duties in the public interest, as defined in paragraph 3 above.

Policy Acknowledgement:

I, _____, a participant in the Connecticut State Innovation Model (SIM) initiative governance process as a member of the Steering Committee and/or one or more Advisory bodies to SIM, acknowledge having received, read, and understood the SIM Policy on Conflicts of Interest dated _____, and agree to adhere to it.

Date: _____

Signature: _____

Name (print): _____

Expiration: This COI policy shall expire effective July 25, 2015