

Conflicts of Interest and the State Code of Ethics

Dan is a UConn Health researcher and the Principal Investigator (PI) on three UConn Health studies. As the PI, Dan is responsible for negotiating a subcontract for completion of some of the labor associated with one of his studies. To assure the highest work quality, Dan believes that the best option is to contract with a company of which his wife is the primary owner and CEO and in which Dan has a small ownership interest.

What are the important considerations under the State Code of Ethics?

The Code of Ethics prohibits a state employee from using his or her state position or authority for personal financial gain. In any situation where a “substantial” or “potential” conflict of interest exists, **an employee must abstain from taking official action** if that action may affect his or her own financial interest, the financial interest of certain family members or the financial interest of a business with which the employee is associated. In this case, because a decision to subcontract with his wife’s company represents a potential or possible substantial conflict of interest, Dan may not make or influence that determination.

Conflicts of interest may arise in any number of research, clinical or business scenarios. To comply with the State Code of Ethics, an employee faced with a potential or substantial conflict of interest must submit a signed written statement describing the situation to his or her immediate supervisor. The matter must be assigned to another individual who is not under the involved employee’s supervision and who is completely free of any associated conflicts of interest.

Additional information and a conflict of interest disclosure form are located on the Office of State Ethics website at http://www.ct.gov/ethics/lib/ethics/forms/eth-coi_11-25-08.pdf.

Employees are encouraged to seek guidance regarding a particular situation before taking any action that may lead to a potential or actual conflict of interest.

For questions, please contact Ginny Pack, UConn Health Ethics Liaison at 860-679-1280 or pack@uchc.edu or the Office of State Ethics at 860-263-2400 or ethics.code@ct.gov.