

HRS OVERSIGHT PROCESSES

OVERVIEW

As part of its commitment to transparency and accountability, the Heart Rhythm Society requires Volunteers, Session Participants, and Authors to disclose and manage relationships between personal, professional, financial or business interests when engaged in Society activities.

The Ethics Oversight Committee is responsible for developing, implementing and overseeing disclosure and conflict of interest processes for Volunteers, and for ensuring the overall compliance with the Society's *Code of Ethics and Professional Standards*. Committees also have a role in the oversight of these processes, and, as necessary, will forward issues to the Ethics Oversight Committee for resolution: the Education and Scientific Sessions Committees for Session Participants; the Scientific and Clinical Documents Committee for writing groups; and the Editor-in-Chief and Managing Editors for authors of journal articles.

The Ethics Oversight Committee has the authority to set and enforce all sanctions, including ratifying or modifying sanctions proposed by those listed above. An appeals process is provided via an independent appeals panel, appointed by the Ethics Oversight Committee, whose decision on sanctions is final.

For additional information, see:

- Ethics Oversight Committee charge
- *HRS Code of Ethics and Professional Standards*
- Program Committee Faculty Disclosure Review Process
- CME Conflict of Resolution Policy
- Policies for Development and Endorsement of HRS Scientific and Clinical Documents

ANNUAL DISCLOSURE PROCESS (Volunteer)

The following describes the process for oversight of the disclosures for all Volunteers (Board of Trustees, committees, subcommittees, writing groups, task forces and the journal's Associate Editors and Editors-in-Chief).

Description

1. The Ethics Oversight Committee sends an electronic disclosure form to all volunteers annually or upon acceptance of assignment, or, at the onset of document development in the case of writing groups.
2. Staff ensures all volunteer disclosures are completed two weeks after the disclosure request.
3. The disclosure information is collected and stored in a secure, uniform database and updated electronically as required. Disclosures are publicly available on the Society website.

4. Prior to each committee, subcommittee, writing group, and task force meeting, Chairs and staff liaisons review disclosure statements in relation to the meeting agenda and resolve conflicts (and potential conflicts) as needed.
5. Chair reads statement at beginning of every meeting reminding members of their obligation to disclose relevant relationships and recuse themselves from voting on any issue with which they have a conflict of interest. In some circumstances, this may require leaving the meeting for the duration of that discussion.
6. An e-mail reminder is sent after six months to update disclosure profiles if needed.

Abstention

1. Upon disclosure of a conflict, volunteer refrains from participating in the decision-making process, and voting on the relevant issue.
2. At the Chair’s discretion, volunteer may be required to physically leave the meeting for the duration of the discussion and/or vote.
3. Staff documents in writing the volunteer’s abstention from discussion and voting, and his/her physical presence or absence.

OVERSIGHT PROCESS

Review of Volunteer Disclosure Forms

<u>Description</u>	<u>Timeframe</u>
1. Each volunteer chair and staff liaison shall review his or her members’ disclosure statements prior to each meeting for any potential conflicts related to the meeting agenda.	Throughout the year
2. Ethics Oversight Committee reviews all officer and Board nominee disclosures so that any concerns can be forwarded to the Nominations Subcommittee before the slating of candidates.	December/January
3. Ethics Oversight Committee reviews all officer and incoming Board disclosures before office is taken, and committee chairs and other Volunteers as deemed necessary.	March
4. Once the Sunshine Law regulations go into effect, an audit will be conducted on a random sample of all volunteers, in which the selected volunteers will receive an email indicating they have been selected for a random audit and asking them to review and certify the accuracy and completeness of the disclosure they have on file, indicating it will be compared to the public reporting website.	

Noncompliance

1. Staff liaison sends reminder to volunteers for completion of disclosure prior to first meeting.
2. Chair intervenes if individuals decline to respond or provide insufficient information.
3. Refusal to adequately disclose may prohibit an individual's participation in all Society activities and may lead to suspension or revocation of membership. The Chair, in consultation with Ethics Oversight Committee Chair, President and CEO, has the authority to make this decision.

Complaints and Conflicts

The Ethics Oversight Committee shall review all circumstances which come to its attention. The Committee shall determine whether there is an actual, potential or perceived conflict of interest and which actions, policies or processes should be implemented to resolve, mitigate or manage the conflict. The Committee has the authority to set and enforce all sanctions.

If a conflict cannot be adequately resolved, mitigated or managed, then the Ethics Oversight Committee, or the Board of Trustees (upon recommendation from the Ethics Oversight Committee), may require the person to limit or curtail certain activities, either within the Society or outside of it, in order to eliminate or remedy the conflict.

1. Any member of the Society or staff may report a potential violation of the Society's disclosure and conflict of interest policies to the Ethics Oversight Committee. If the concern applies to a specific committee, writing group, or task force of the Society, members should submit their concerns first to the Chair of the committee, writing group or task force. The Chair may confer with the Ethics Oversight Committee if necessary. Sanctions recommended by a committee are reviewed and ratified (or modified) by the Ethics Oversight Committee.
2. Complainant identity is revealed only to members of the Ethics Oversight Committee.
3. Retaliation against complainants (volunteer, staff or Members,) is strictly prohibited. Complainants who believe they have been retaliated against may seek redress by the Ethics Oversight Committee.
4. Complainant completes a Conflict of Interest Complaint Form and submits it to the Ethics Oversight Committee Chair. Staff verifies identity of complainant.

VIOLATIONS PROCESS

1. Alleged violations of the HRS disclosure policy are reviewed by the appropriate committee and include neglect or willful noncompliance with disclosure requirements, or complaint filed by members or staff. Violations may be reported to the Ethics Oversight Committee by the Chair for review and sanctions if appropriate, or as requested by the complainant.

2. For issues forwarded to the Ethics Oversight Committee, the Chair will convene the committee to review the written complaint, decide on the need for additional information or evidence, obtain needed data, review the case and render a judgment.

Sanctions may include a) temporary or permanent suspension of the individual from elected or appointed positions in the Society, b) temporary or permanent suspension of the individual from participation in HRS educational activities, and c) reporting of the violation to the individual's institution.

3. Staff documents the committee's proceedings and final decision.
4. Chair of the Ethics Oversight Committee communicates the decision in writing to the complainant, the target of the complaint (explaining the right to appeal), and the President.
5. Staff implements the committee's decision.
6. Process is to be completed in no more than 90 days.

APPEALS PROCESS

1. Sanctioned individual files a request for appeal with the Society's President, documenting a case for overturning the committee's decision.
2. President consults with Immediate Past President (who serves as the Chair of the Governance Committee) and CEO to appoint a three-member independent appeals panel. Appointees must be able to demonstrate through their own disclosures on record that they are free of conflicts with the sanctioned individual and his/her institution. President designates one panel member as Chair.
3. Chair of the Appeals Panel convenes the panel to review existing documentation of the case from the Ethics Oversight Committee (or other involved committee), decide on the need for additional evidence and means to acquire it, review the evidence supporting and disputing the sanctions, and render a final judgment. Decisions of the Appeals Panel are final and may not be overturned.
4. Staff documents the panel's proceedings and final decision.
5. Chair communicates the panel's decision in writing to the sanctioned individual, the Chair of the Ethics Oversight Committee, any others involved as appropriate (e.g., Chair of the Education or Program Committee or Editor-In-Chief), the President and the CEO.
6. Process is to be completed in no more than 45 days (from time of appeal to decision).