

# Conflict of Interest Disclosure Procedure

## Introduction

The work of the Health Physics Society ("HPS", "Society") is largely done by volunteers and committees appointed for their expertise and their willingness to serve the Society. Volunteers are drawn from every part of the Society. Their skills and generous contributions of time are essential to the ability of the Society to serve the radiation safety community and while serving in key volunteer Society roles, including but not limited to the HPS Board of Directors and Advisors, Scientific & Public Issues Committee, and Finance Committee. The Board of Directors will request any additional individuals complete the Conflicts of Interest Disclosure Form as determined by the Board.

In these volunteer roles, they are official representatives of the Society. Because of their financial and legal and/or other fiduciary responsibilities for the affairs of the Society, it is particularly desirable that individuals who serve as volunteer leaders disclose and be free from real or perceived conflicts while fulfilling their fiduciary responsibilities with care and loyalty.

The integrity of the Society must be protected at all times. Through this procedure, the volunteer Society leadership intends to also implement the highest possible ethical standards and will not tolerate conflicts of interest, in accordance with the following principles:

## Conflict of interest

The term "conflict of interest" means any financial or other interest which conflicts with the service of an individual because it:

- Could impair the individual's objectivity.
- Could create an unfair competitive advantage for any person or organization.

Participation with a group which may receive economic (or other) benefit or loss due to action of the Society would generally not be considered a conflict of interest unless the direct and immediate economic benefit to the individual or persons related to the individual by family or marital relationships or by close personal relationships was significant (i.e., greater than \$10,000) and may interfere with the best interests of the Society.

## Ethical standard

The term "ethical standard" means that the Society expects all persons with a fiduciary relationship to the Society to observe the highest standards of business ethics. No volunteer shall take any action on behalf of the Society that they know, or reasonably should know, violates any applicable law or regulation, including but not limited to activities such as bribery, kickbacks, falsehoods or misrepresentations.

## Procedures for addressing possible conflict of interest

The Society follows a procedure that seeks to:

- Guard against reasonably perceived or real conflicts of interest.

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- Maximize the credibility of actions and reports of the Society.
- Equip the Society, through early consideration of any potential sources of conflict of interest, to defend volunteers acting in a fiduciary manner, and guide their participation in governance and other leadership activities, against possible allegations of conflict of interest.
- Act in the highest ethical manner.

HPS volunteers, including but not limited to individuals elected to the HPS Board of Directors, Advisors, and individuals appointed to the Scientific & Public Issues Committee or Finance Committee, or any other volunteers acting in a fiduciary manner, are asked to complete a Disclosure of Conflicts of Interest form annually. The disclosure shall list relevant connections and interests that may constitute potential sources of conflicts of interest within the meaning of this procedure, in light of the responsibilities falling to the volunteer leaders of the Society. The inclusion of a connection or interest in the list does not necessarily mean that the relationship requires action or recusal from a vote by the member.

As part of any meeting or other proceeding involving a binding vote or other significant decision, the chair of the HPS Board of Directors, Scientific & Public Issues Committee, or Finance Committee, shall ask all members of the Board or Committee to disclose any potential conflicts. The individual may choose to recuse themselves from vote or discussion based on the conflict. If there is a question regarding the individual's participation in a vote or discussion, the Board of Directors shall have final say over the determination as defined in the next paragraph. Recusals shall be recorded in the minutes.

## Final determination

The overriding objective of this procedure is to ensure that the work of those who volunteer their time and energy to the Society and the radiation safety community is not compromised or diminished by real or perceived conflicts of interest. If a determination of conflict of interest of a member of a Committee cannot be resolved by the Committee, the Committee Chair will bring the matter to the Director responsible for the Committee. The Director will bring the matter to the HPS Board of Directors to make a final determination by majority vote of the Board members present during a closed session. If a determination of conflict of interest of a member of the Board cannot be resolved by the individual Board member, the HPS Board of Directors, excluding that individual, will make a final determination by majority vote of the Board members present during a closed session.

## Confidentiality

All completed Conflicts of Interest Disclosure forms are treated in confidence. Access to these forms within the Society is restricted to the HPS Board of Directors. It is the policy of the Society that completed forms will not be released by the Society except with the approval of the individual completing the form, unless required by law. The request for information on the Conflicts of Interest Disclosure form and the discussion of potential sources of conflict of interest

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are not intended to question the personal integrity of any individual. Indeed, the form is designed to elicit only that information which is relevant and merits disclosure in light of the conflict of interest procedure set forth above and the responsibilities of the volunteer on the fiduciary body of which the individual serves. The responsibility for determining the information to be reported rests with the individual completing the form, in reliance upon the individual's own sense of integrity and good judgment.

## **Recordkeeping**

Each member shall keep their own records of their conflicts of interest as determined by the Board or by themselves that require recusal from vote or discussion. The minutes of the Committee or Board meeting shall document any recusal or determination of conflict of interest. If the determination is referred to the Board for discussion in closed session, the minutes of the Board meeting shall reflect the Board's determination of conflict and any recusal actions recommended by the Board. Documentation of determinations during a closed session shall include a summary explanation of the reasons that the determination was made. The HPS Executive Director will also keep an accessible master record of all determinations to ensure compliance for each member and consistency in the application of this procedure.

The Executive Committee shall review the master list at least annually to prepare a list of FAQs or examples to assist future individuals in determining recusal.

# Conflict of Interest Disclosure Form

Name	
Email	

## Background

I have read the HPS Conflict of Interest Procedure and in accordance with the purposes and intent of the HPS Conflict of Interest Procedure, I hereby disclose that I, or my immediate family members, have the following affiliations, interests or relationships, and/or have taken part in the following transactions which may be regarded as a possible conflict of interest.

Do you or any immediate family member (mother, father, sibling, child, spouse/partner), directly or indirectly:

1. Have an ownership or investment interest in any organization that does or may do business (i.e., sell to or purchase from) with the HPS?

No  Yes

If Yes, explain:	
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2. Have a compensation arrangement with any organization that does or may do business with the HPS, or conducts policy work that does not align with HPS's mission?  
Examples: compensation for employment or independent contractor services, consulting fees, honoraria, etc.

No  Yes

If Yes, explain:	
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3. Do you receive other direct benefit, greater than \$10,000 for compensation, research support, etc., from an organization that does or may do business with the HPS, and/or that may raise serious policy conflicts, and/or that may have significant public impact on the mission and reputation of the Society?

If yes, please indicate from which funding entities you receive direct benefit.

- I DO NOT receive any other direct benefit
- US Nuclear Regulatory Commission (NRC)
- US Department of Energy (DOE)
- US Environmental Protection Agency (EPA)
- National Council on Radiation Protection and Measurement (NCRP)
- International Commission on Radiological Protection (ICRP)
- Other

If Other, explain:	
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4. Serve as or hold a director, trustee, officer or board committee position with any other organization that does or may do business with the HPS, or that has similar interests as the HPS (including scientific publications, or competition for grants or donations), and/or that may raise serious policy conflicts, and/or that may have significant public impact on the mission and reputation of the Society?

No  Yes

If Yes, explain:	
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Please note that, from time to time, in your volunteer role as an officer, committee member, advocate, etc. you may be asked to provide input or vote on a matter that may provide an advantage to an organization from which you receive support. It is each member's responsibility to properly disclose any such real or perceived conflicts and recuse themselves from any vote, as appropriate, when these instances arise.

## Other

In the space below, please disclose any interest, activities, investments or involvement that you think might be relevant for full disclosure of all actual, apparent or possible conflicts of interest as noted above or otherwise:

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I acknowledge that it is my responsibility to ensure that my disclosure information is current and complete and to update my disclosure records throughout the year if my relevant relationships change.

Signature	
Date	