

## 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 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 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 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 Committee, whose decision on sanctions is final.

For additional information, see:

- Ethics 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, working groups, task forces and the Journal's Associate Editors, Section Editors, Statistical Editors, Editorial Board members, and, Editors-in-Chief).

#### Description

1. Staff 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 encourages 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, working groups, writing groups, and task force meetings, Chairs and staff liaisons review disclosure statements in relation to the meeting agenda and resolve conflicts (and potential conflicts) as needed.
5. The 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.

## **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.

## **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 incomplete 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 Committee Chair, President and CEO, has the authority to make this decision.

## **Complaints and Conflicts**

The Ethics 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 Committee, or the Board of Trustees (upon recommendation from the Ethics 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 Committee. If the concern applies to a specific committee, working group, writing group, or task force of the Society, members should submit their concerns first to the Chair of the committee, working groups, writing group or task force. The Chair may confer with the Ethics Committee if necessary. Sanctions recommended by a committee are reviewed and ratified (or modified) by the Ethics Committee.
2. Complainant identity is revealed only to members of the Ethics 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 Committee.
4. Complainant completes a Conflict of Interest Complaint Form and submits it to the Ethics 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 Committee by the Chair for review and sanctions if appropriate, or as requested by the complainant.

2. For issues forwarded to the Ethics 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 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 Ethics 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. The Ethics Committee shall review all circumstances which come to its attention. The Ethics Committee shall determine whether there is an actual, potential, or perceived conflict of interest and which actions, policies, or processes can be implemented to resolve, mitigate, or manage the conflict.

An appeals process is provided via an independent appeals panel, appointed by the Ethics Committee, whose decision on sanctions is final. 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.

2. Chair of the Appeals Panel convenes the panel to review existing documentation of the case from the Ethics 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.
3. Staff documents the panel's proceedings and final decision.
4. Chair communicates the panel's decision in writing to the sanctioned individual, the Chair of the Ethics Committee, any others involved as appropriate (e.g., Chair of the Education or Program Committee or Editor-In-Chief), the President and the CEO.
5. Process is to be completed in no more than 45 days (from time of appeal to decision).
6. If a conflict cannot be adequately resolved, mitigated, or managed, then the Ethics Committee or the Board of Trustees (upon recommendation from the Ethics 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.