

Orthotic and Prosthetic Assistance Fund (OPAF)

Conflict of Interest

Policy

**for Officers, Directors, Committee
Members,
Staff Members
and all Volunteers**

rev. 1/28/03

1. Requirements

Policy Statement:

All Officers, Directors, Committee Members, Staff Members and all Volunteers of the Orthotic and Prosthetic Assistance Fund (*OPAF or the Organization*) shall avoid situations that create even the appearance or perception of a conflict of interest.

- A conflict of interest may exist in a situation, in which an OPAF Officer, Director, Committee Member, Volunteer or Staff Member is involved in an activity or has a private, personal, organizational or professional interest, that might interfere or that appears to influence such Officer's, Director's, Committee Member's, Volunteer's or Staff Member's objectivity in performing his or her duties and responsibilities to OPAF;
- A conflict of interest will exist in a situation, in which an OPAF Officer, Director, Committee Member, Volunteer or Staff Member derives any personal profit or gain from any other party, directly or indirectly, by virtue of his/her participation in the Organization;
- Any activity or personal interest, which creates even the appearance or perception of a conflict of interest, including the activities or personal interests of the immediate family of OPAF Officer's, Director's, Committee Member's, Volunteer's or Staff Member's, is prohibited, unless formally approved in writing by the OPAF Board, as a whole.

Actual versus Perceived Conflicts:

An actual conflict of interest need not be present to constitute a violation of this policy. Activities that create the appearance of a conflict of interest also must be avoided in order not to reflect negatively upon the reputation and integrity of the Organization.

Benefits of Compliance:

- **Integrity and Credibility** --- The Organization proudly serves the Orthotic & Prosthetic (O&P) community as a whole, rather than only serving certain special interest groups. Therefore, the appearance of a conflict of interest might not only cause embarrassment for the Organization, but may jeopardize the credibility of the Organization itself.
- **Trust and Confidence** --- It is in the interest of OPAF, its Board members, and its staff to strengthen trust and confidence in each other, to expedite resolution of problems, to mitigate the effect and to minimize organizational and individual stress that can be caused by a conflict of interest.

2. *Responsibilities*

Disclosure of Conflicts:

Every OPAF Officer, Director, Committee Member, Volunteer or Staff Member must fully and immediately* disclose to his or her immediate supervisor, or to the OPAF Executive Director, any of the following personal interests:

- Any investment or ownership interest in:
 - a business, client, or other organization, which provides any benefit or service to the Organization, or that receives any benefit or service from the Organization;
 - a business, client, or other organization, which performs or seeks to perform services under contract with the Organization; or
 - a business, client, or other organization, that is otherwise in a position to benefit from the actions of any OPAF Officer, Director, Committee Member, Volunteer or Staff Member.
- Any employment, fiduciary, customer, officer, director, partner, consultant, representative, agent or advisor relationship in:
 - a business, client, or other organization, which provides any benefit or service to the Organization, or that receives any benefit or service from the Organization (e.g., vendor or supplier);
 - a business, client, or other organization, which performs or seeks to perform services under contract with the Organization; or
 - a business, client, or other organization, that is otherwise in a position to benefit from the actions of any OPAF Officer, Director, Committee Member, Volunteer or Staff Member

* If possible, such disclosure should occur **before** the OPAF Officer, Director, Committee Member, Volunteer or Staff Member, or his/her immediate family member, as applicable, undertakes the

above-referenced conduct. However, disclosure is still required if the following conditions exist or have existed prior to acknowledgement of this Conflict of Interest Policy Statement.

OPAF Resources (e.g., Client Lists, etc.)

Each OPAF Officer, Director, Committee Member, Volunteer or Staff Member, including every immediate family member, is prohibited from utilizing the OPAF client lists, or any other resources or assets of the Organization, for any personal or private solicitation or other purposes, outside of the business of the Organization.

Prohibition Concerning Accepting Gifts:

Each OPAF Officer, Director, Committee Member, Volunteer or Staff Member, including every immediate family member, is prohibited from accepting money of any amount, and from accepting gifts, other than gifts of nominal value, from the following:

- a business, client, patient, customer or other organization, which provides any benefit or service to the Organization, or that receives any benefit or service from the Organization;
- a business, client, patient, customer or other organization, which performs or seeks to perform services under contract with the Organization (e.g., vendor or supplier); or
- a business, client, patient, customer or other organization, that is otherwise in a position to benefit from the actions of any OPAF Officer, Director, Committee Member, Volunteer or Staff Member

Activities Involving Honoraria:

OPAF Officers, Directors, Committee Members, Volunteer or Staff Members must have the prior written approval of the OPAF Executive Director and the OPAF President, in order to receive honoraria for lectures and other similar activities conducted in a role as representative of OPAF

- In order to receive the approval of the OPAF Executive Director and the OPAF President to receive honoraria for lectures and other similar activities such lectures and other activities must occur during either the OPAF Officer's, Director's, Committee Member's, Volunteer's or Staff Member's personal days, compensatory time, annual leave or leave without pay.
- Any such honoraria received by OPAF Officers, Directors, Committee Members, Volunteer or Staff Members, and in connection with activities relating to OPAF employment, is to be paid to the Organization.

Conflict of Interest Policy

Statement of

Acknowledgement and Agreement

I _____, in my role as OPAF Board Member, OPAF Staff Member or OPAF Volunteer (*circle one*) hereby acknowledge my duty to uphold the requirements and responsibilities of the OPAF Conflict of Interest Policy, and I specifically acknowledge and agree to the following:

- I shall not derive any personal profit or gain, directly or indirectly, by reason of my participation with the OPAF;
- I shall immediately disclose to my immediate OPAF supervisor, or to the OPAF Executive Director, any personal interest, which I may have in any matter pending before the OPAF and shall refrain from participation in any decision on such matter that requires review or ratification by the full board;
- I shall refrain from obtaining any OPAF client list of OPAF, or other OPAF asset or resource, for personal or private purposes at any time during the term of my affiliation with OPAF;
- I hereby disclose, as of this date, any and all of my board memberships, committee memberships, and employment with the following nonprofit and for-profit organizations:

Furthermore, I certify that, except as I have fully explained below, I am not now, nor at any time during the past year have I been either:

1. A participant, directly or indirectly, in any arrangement, agreement, investment, or other activity with any vendor, supplier, or other party, doing business with OPAF, which has resulted or could result in person benefit to me; or
2. A recipient, directly or indirectly, of any salary payments or loans or gifts of any kind or any free service or discounts or other fees from or on behalf of any person or organization engaged in any transaction with OPAF.

Any exceptions to 1 or 2 above are stated below with a full description of the transactions and of the interest, whether direct or indirect, which I have (or have had during the past year) in the persons or organizations having transactions with the OPAF.

With my signature, I hereby confirm that I have read and that I understand the attached Conflict of Interest Policy (version 1/15/03). I understand that the policy sets forth the expectations that OPAF has with regard to all of its Officers, Directors, Committee Members, Staff Members and all Volunteers.

Signature: _____ Printed name: _____ Date: _____

Please return your complete, executed agreement to OPAF at the following address, keeping a copy for your own records:
1666 K Street NW, Suite 440, Washington, DC 20006