



ISHLT

A Society that Includes Basic Science, the Failing Heart, & Advanced Lung Disease

ISHLT Response to OPTN Proposal to Establish Code of Conduct and Whistleblower Protection Bylaws

The International Society for Heart and Lung Transplantation (ISHLT) appreciates the opportunity to comment on the policy proposal to “Establish Code of Conduct and Whistleblower Protection Bylaws” and supports the OPTN bylaws changes proposed.

Comments on the proposal:

- The proposal would benefit from additional clarification about the process for handling alleged violations to ensure members have due process and to ensure the language is consistent with legal terminology and standards for corporate governance.
- To avoid real or perceived conflicts, we recommend the Compliance Officer not be a member of the Board.
- The policy should not include specific attendance requirements for members, as conflicting clinical responsibilities may make such requirements difficult to meet.
- The Code of Conduct should not preclude the expression of individual members’ opinions (when expressed as independent from the OPTN), even if those opinions are contrary to those of the OPTN.

ISHLT Level of Support: Support the Policy