



**CORPORATE DISCLOSURE  
OF APPEARANCES OF BIAS  
AND CONFLICTS OF  
INTEREST**

**ORAU TEAM  
Dose Reconstruction  
Project for NIOSH**

**Subcontractor to:** CDC

Subcontractors providing personnel under the Oak Ridge Associated Universities (ORAU) contract with the Centers for Disease Control and Prevention to support National Institute for Occupational Safety and Health (NIOSH) responsibilities under the Energy Employees Occupational Illness Compensation Program Act of 2000 (EEOICPA), are required to complete this form to identify any and all United States Department of Energy (DOE) and/or Atomic Weapons Employer (AWE) sites where any potential corporate appearances of bias (AOB), any potential and actual financial conflicts of interest, and/or any potential appearances of loss of impartiality might exist pursuant to the “NIOSH Policy on the Appearance of Bias for the EEOICPA Program & General Conflict of Interest Requirements” (hereafter referred to as the NIOSH AOB Policy) and the “Implementing Procedures for the NIOSH Policy on the Appearance of Bias for the EEOICPA Program & General Conflict of Interest Requirements.”

The subcontractor’s contracting officer must sign this Corporate Disclosure of Appearances of Bias and Conflicts of Interest. This form, with signatures redacted, will be posted on the ORAU Team website ([www.oraucoc.org](http://www.oraucoc.org)). In addition, specific sites, for which it has been established that your company has any potential corporate AOB, any potential and actual financial conflicts of interest, and/or any potential appearances of loss of impartiality, will be assigned to the individual employees that your corporation provides to the ORAU Team. These specific sites, in addition to sites for which the individual employee has identified any personal potential AOB, any potential and actual financial conflicts of interest, and/or any potential appearances of loss of impartiality, will be listed on each individual employee’s Web Disclosure Statement, which is also available to the general public on the ORAU Team website ([www.oraucoc.org](http://www.oraucoc.org)).

**CORPORATE DISCLOSURE**

- \_\_\_\_\_ has **NO** (1) potential AOB, which is governed by the NIOSH AOB Policy; (2) potential and actual financial conflicts of interest; or (3) potential appearances of loss of impartiality regarding any DOE and/or AWE sites, which are governed [both (2) and (3)] by the Federal Acquisition Regulation and its requirements regarding organizational conflicts of interest and by contractual requirements regarding conflicts of interest.
- ORAU discloses the following (1) potential AOB, which is governed by the NIOSH AOB Policy; (2) potential and actual financial conflicts of interest; and (3) potential appearances of loss of impartiality regarding the following DOE and/or AWE sites, which are governed [both (2) and (3)] by the Federal Acquisition Regulation and its requirements regarding organizational conflicts of interest and by contractual requirements regarding conflicts of interest.

<u>SITE</u>	<u>CLIENT</u>	<u>DATE</u>
Oak Ridge Institute for Science and Education	U.S. Department of Energy	7/1/00-Present
ORINS/ORAU (aka ORISE)	U.S. Department of Energy	1947-7/1/00
Oak Ridge Hospital	AEC/ERDA	1940s-1960s
Rocky Flats Plant	U.S. Department of Energy	1992-2004

**CORPORATE DISCLOSURE OF APPEARANCES OF BIAS AND CONFLICTS OF INTEREST –  
Continued**

**CORPORATE APPEARANCES OF BIAS AND CONFLICTS OF INTEREST AGREEMENT**

ORAU, as a condition of performing work on the ORAU Team Dose Reconstruction Project, hereby agrees to the following terms and restrictions:

1. We shall direct our employees that are requested to serve in any of the following Key Program Functions (as defined in Appendix A of the “Implementing Procedures for the NIOSH Policy on the Appearance of Bias for the EEOICPA Program & General Conflict of Interest Requirements”):
  - Site Profile Document Owner
  - Site Expert
  - Site-Specific Technical Information Bulletin Owner
  - Special Exposure Cohort (SEC) Petition Evaluation Report Owner
  - Scientific/Technical Peer Reviewer
  - Author/Owner of Site-Specific “White Paper” or Other Product Prepared for Purposes of Board, Work Group, and/or Subcommittee Discussion
  - Dose Reconstructor
  - Dose Reconstruction Reviewer
  - Dose Reconstruction Report Peer Reviewer
  - Lead Dose Reconstruction Reviewer
  - Worker/Site Profile Reviewer
  - Lead Worker/Site Profile Reviewer
  - SEC Petition Reviewer
  - Lead SEC Petition Reviewer

to recuse themselves from the performance of these duties pertaining to any of the DOE and/or AWE sites that are specifically listed under “Corporate Disclosure.”

2. We shall ensure, in concert with ORAU, that such recusals are executed.
3. We shall promptly update and resubmit this form whenever any changes are necessary for the information on this form to be complete and accurate.

Contracting Officer: Signature on File 4/13/23 Corporate Position: Chief Legal & Risk Officer  
Signature/Date

Print Name: Rachel F. Lokitz

Witness: Signature on File 4/13/23  
Signature/Date

Print Name: Evelyn Stone