

Conflict of Interest in Leadership Policy

Scope

This policy applies to any staff member in a leadership role related to any Mayo Clinic Clinical Practice, Education, Research, Purchasing or Administrative activity. Also applies to all members of the Mayo Clinic Community Accountable Care Organization, LLC Governing Board (ACO Board) as well as ACO Corporate Officers.

Purpose

This purpose of this policy is to maintain credibility, trust and effectiveness with patients, staff and Mayo's external stakeholders.

Policy

For decisions related to any Mayo Clinic Clinical Practice, Education, Research, Purchasing or Administrative activity made by any staff member in a leadership role who has a financial interest related to the decision, full disclosure of the financial interest must occur to all those involved in the decision-making process.

The staff member who has the financial interest may participate in the decision-making process sharing his/her expertise, but may not lead the process or vote on the final outcome.

The staff member's disclosure of the financial interest and recusal from leading the process or voting on the final outcome should be documented in meeting minutes summarizing the overall decision-making process.

A staff member who accepts another job offer outside of Mayo Clinic must notify their supervisor immediately of their intent to resign. The intent of this expectation is to minimize any disruption to the work unit and begin succession planning. Depending on the staff member's position at Mayo Clinic, and their new position outside of Mayo Clinic, additional steps may be taken to minimize any potential conflicts of interest.

In addition, when a staff member accepts another job offer outside of Mayo Clinic the staff member is expected to understand when participation in Mayo Clinic confidential or strategic meetings poses a potential conflict of interest between Mayo Clinic's interest and that of their new role and/or new employer. When such circumstances arise, employees should recuse themselves from these confidential or strategic direction meetings and related decisions.

Related Procedure(s)

N/A

Related Document(s)

[Business Confidentiality](#)

Definitions

Financial Interest means anything of monetary value, whether or not the value is readily ascertainable.

References

N/A

Approved by

Conflict of Interest Review Board

Mayo Clinic Board of Governors 12/2013

Owner

[Monica Sveen-Ziebell](#), on behalf of the Conflict of Interest Review Board

Contact

[Monica Sveen-Ziebell](#), Administrator

Revision History

| Date | Synopsis of Change |
|------------|---|
| 05/13/2019 | Minor Revision - Initial ACO acronym changed to Accountable Care Organization. |
| 05/05/2019 | Revised - Added ACO statement to Scope as required by CMS and checked document into the Policy and Procedure Management System. |
| 08/02/2016 | Updated into current policy template. |
| 06/01/2015 | Created separate policies by subject versus one Conflict of Interest Policy. |