

Conflict of Interest

# Conflict of Interest in Purchasing Policy

## Scope

Applies to all Personnel involved in purchasing decisions.

## Purpose

To identify and manage financial Conflicts of Interest in purchasing decisions.

## Policy

- Purchasing decisions include, but are not restricted to, the following:
  - The decision to purchase a product or technology (i.e., the request that a purchase order be generated).
  - The selection of a supplier for a product or technology for evaluation, competitive bid, or proposal.
  - The actual negotiation of a purchasing agreement or contract with a supplier of a product or technology.
- There is a need to identify and address financial conflicts of interest so Mayo Clinic may make quality and price-driven decisions without the influence of Personnel with a financial conflict.
- Conflict of interest management strategies include, but are not limited to the following:
  - Full disclosure by Personnel to the decision-making body of any financial conflicts at the time of purchase discussions. This disclosure is required for all members involved in the decision-making process, including those who initiate, review, and make decisions about proposals to purchase goods or services.
    - If a financial conflict exists, recuse from chairing a decision-making process.
    - If a financial conflict exists, recuse from final decision-making process.
  - Disclosure information must be available to all those participating in the purchasing or decision-making process and must be included as part of the record documenting the final decision.

## Policy Notes

N/A

## Related Procedures

[Conflict of Interest in Purchasing - Operational Guidelines](#)

## Related Documents

[Disclosure Form for Potential Conflicts of Interest in Purchasing and Other Decision-Making Processes](#)

## Definitions

**Financial Interest:** Anything of monetary value, whether or not the value is readily ascertainable.

**Personnel:** Consulting staff, staff physicians, scientists, visiting scientists, appointees, research temporary professionals, residents, fellows, students, and allied health staff employed by Mayo, who work in facilities owned or controlled by Mayo or are involved in any Mayo program.

## References

[Department of Supply Chain Management](#)

## Owner

[Monica Sveen-Ziebell](#), on behalf of the Medical-Industry Relations Committee

## Contact

[Monica Sveen-Ziebell](#), Administrator

## Revision History

Date	Synopsis of Change
06/07/2022	Standard two-year review. Aligned definition of Personnel with other COI documents. Removed ACO from scope, as it now has a stand-alone policy. Simplified purpose statement. Removed language specific to inventors and replaced with all financially conflicted individuals. Updated document to include more general purchasing terms.
06/08/2020	Aligned Scope and Purpose sections to Policy Office requirements; changed staff/employee to "Personnel" throughout the policy and added "Personnel" to the Definitions section; Added information when Mayo Personnel develop inventions and technologies and need to address actual or potential conflicts of interest; clarified full disclosure of any potential conflicts by all decision makers is required and should be available for the decision making process; made minor non-substantive changes for clarity and to make the policy more internally consistent.  Conflict of Interest Review Board: 08/12/2019  Mayo Clinic Board of Governors: 05/18/20
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.
10/05/2016	Hyperlink errors corrected.
8/2/2016	Created separate policies by subject versus one Conflict of Interest Policy.
12/2013	Approval for need to establish document:  Conflict of Interest Review Board  Mayo Clinic Board of Governors 12/2013

## Content Information

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Workflow Reviewer Name(s): Melissa A. Flom Murphy, J.D.

Workflow Approver Name(s): Sveen Ziebell, Monica M., M.B.A.

Scheduled Review Due Date: 06/14/2024

Comments: 12/03/2021 Per Tim Graner, London is now added as an applicable site for this document. Defined 1st ACO, Revised History; noted 05/05/2019 doc not processed through; Please keep expiration date the same

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