

Conflict of Interest in Purchasing Policy

Scope

This policy applies to all Mayo Clinic employees involved in purchasing decisions. 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

To allow the Department of Supply Chain Management to make quality and price-driven decisions removed from the influence of staff members who may have outside financial interests.

Policy

The mission of the Department of Supply Chain Management (SCM) at Mayo Clinic is to deliver innovative solutions that result in the acquisition of high value supplies and services, sustained financial improvement, excellent customer service, and operational efficiency. This department may make quality and price-driven decisions removed from the influence of investigators who may have been involved in development of the product. With many technologies or devices, often the user of the technology with the best knowledge is the investigator who invented it or is funded to study it. For this reason, SCM decisions include, but are not restricted to, the following:

- The decision to actually 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.

Management strategies may include, but are not limited to the following:

- Full disclosure of potential conflicts to the decision-making body at the time of purchase discussions.
- Recusal from chairing a decision-making process.
- Recusal from final decision-making process.
- Documentation of recusal in meeting or purchase decision minutes.

Related Procedure(s)

[Purchasing Operational Guidelines](#)

Related Document(s)

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

Definitions

N/A

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.
10/05/2016	Hyperlink errors corrected.
08/02/2016	Created separate policies by subject versus one Conflict of Interest Policy.