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

<table>
<thead>
<tr>
<th>Date</th>
<th>Synopsis of Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>05/13/2019</td>
<td>Minor Revision - Initial ACO acronym changed to Accountable Care Organization.</td>
</tr>
<tr>
<td>05/05/2019</td>
<td>Revised - Added ACO statement to Scope as required by CMS and checked document into the Policy and Procedure Management System.</td>
</tr>
<tr>
<td>10/05/2016</td>
<td>Hyperlink errors corrected.</td>
</tr>
<tr>
<td>08/02/2016</td>
<td>Created separate policies by subject versus one Conflict of Interest Policy.</td>
</tr>
</tbody>
</table>