

Conflict of Interest

# Conflict of Interest in Leadership Policy

## Scope

Applies to Personnel in a Leadership role related to any Mayo Clinic Clinical Practice, Education, Research, Purchasing or Administrative activity.

## Purpose

To address conflicts in Leadership in order to ensure credibility, trust and transparency with Mayo Clinic patients, Personnel and external stakeholders, and to ensure compliance with institutional standards and any regulatory requirements. The primary duty of Personnel in Leadership roles is to Mayo Clinic and to its patients.

## Policy

- Where decisions related to any Mayo Clinic Clinical Practice, Education, Research, Purchasing, or Administrative activity involve Personnel in a leadership role who have a financial interest related to the decision, full disclosure of the financial interest must be made to all those involved in the decision-making process.
- Personnel who have a financial interest may participate in the decision-making process to the extent of sharing their expertise, but they must not lead the process or vote on the final outcome.
- Disclosure of the financial interest and recusal from leading the process or voting on the final outcome must be documented in meeting minutes summarizing the overall decision-making process.
- Personnel in a Leadership role who accept an offer of employment outside Mayo Clinic must notify their supervisor of their intention to resign immediately upon accepting the new position. This minimizes disruption to the work unit and permits succession planning to begin. Depending on the staff member's position at Mayo Clinic, and their new position outside of Mayo Clinic, additional steps may be taken by the Conflict of Interest Review Board to minimize any potential conflicts of interest.
- When Personnel in a Leadership position accept an offer of employment outside Mayo Clinic, that individual must consider when participation in Mayo Clinic confidential or strategic meetings poses a potential conflict of interest between Mayo Clinic's interests and the interests of their new role and/or new employer. When such a conflict of interest arises, the individual must recuse themselves from the confidential or strategic direction meetings and related decisions and must neither attend nor participate in any way.

## Policy Notes

N/A

## Related Procedures

N/A

## Related Documents

[Confidential Business Information Policy](#)

## Definitions

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

**Leadership:** All Personnel who are members of the Board of Governors, who are Directors or Assistant Directors of any Mayo Clinic specialty Centers (for example, the Center for Individualized Medicine, the Center for Regenerative Medicine), Division Chairs.

**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

N/A

## Owner

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

## Contact

[Monica Sveen-Ziebell](#), Administrator

## Revision History

Date	Synopsis of Change
05/03/2022	Standard two year review. No substantive edits. Updated definition of Personnel to align with other COI documents. Removing ACO from scope, as they now have a stand-alone COI policy.
06/08/20	Minor wording revisions. Addition of definitions.
8/2/2016	Updated into current policy template.
6/01/2015	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

## 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: 05/13/2024

Comments: 12/03/2021 Per Tim Graner, London is now added as an applicable site for this document. Added ACO language to Scope as required by CMS

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