

Conflict of Interest

Institutional Conflict of Interest Policy

Scope

This policy applies to all Mayo Clinic Personnel related to any Mayo Clinic Clinical Practice, Education, Research, Purchasing, or Administrative activity.

Purpose

The purpose of this policy is to set forth the mechanisms for identifying, disclosing, reviewing, and managing potential Institutional Conflicts of Interest (Institutional COI).

Policy

Institutional COI describes a situation in which the financial interests of an institution or an institutional official, acting within his or her authority on behalf of the institution, may affect or appear to affect the research, education, clinical care, business transactions, or other activities of the institution. Institutional conflicts of interest are reviewed and managed by the Mayo Clinic Conflict of Interest Review Board.

Institutional COI may include, but is not limited to, relationships involving intellectual property, investments, royalties, equity positions, research sponsors, research funding, individual financial donors, personal compensation or honoraria, and/or board memberships.

All Mayo Clinic Personnel are expected to (1) abide by Mayo Clinic's conflict of interest policies and standards; (2) fully and continually disclose professional and relevant personal activities and relationships that create a conflict of interest or conflict of commitment; (3) remedy conflicts of interest or commitment and/or comply with any management or monitoring plan prescribed by Mayo Clinic Conflict of Interest Review Board; (4) remain aware of the potential for conflicts of interest and commitment; and (5) take initiative to manage, disclose, or resolve conflicts of interest or commitment, as appropriate.

Mayo Clinic Personnel in leadership positions have the responsibility to understand and implement institutional policies pertaining to conflicts of interest and commitment, as necessary, for their respective roles.

Research: An Institutional COI in Research may occur whenever the financial interests of the institution, or of an institutional official who has authority to act on behalf of the institution, might affect, or reasonably appear to affect, institutional processes for the design, conduct, reporting, review, or oversight of research. Particular consideration should be given to, and management plans should reflect the potential risk to human subjects involved in the research, the content of the informed consent document regarding the COI, the magnitude and nature of the institution's financial interests, the extent to which the institutional financial interest could be influenced by the research and vice versa, and the degree to which the risk of bias may be mitigated.

Protection of Interests and Goals of Trainees: The interests and goals of trainees must not be compromised for the benefit of institutional financial relationships. Trainee efforts to conduct research, publish results, and pursue academic inquiry must be paramount to the demands or desires of institutional financial partners.

Unless a management strategy has first been approved by the Mayo Clinic Conflict of Interest Review Board, a mentor, supervisor or program director may not assign students, postdoctoral fellows, residents, or other trainees under their supervision to institutional projects in which Mayo Clinic has a material financial interest.

Institutional COI Management

The Conflict of Interest Review Board will interpret and apply Federal regulations and Mayo Clinic principles and policies regarding potential conflict of interest involving Mayo Clinic, individual staff members, institutional officials, and all Mayo Clinic entities, including Mayo Clinic Ventures, MCSI, MML, and other internal entities. The Conflict of Interest Review Board also will provide counsel to the Mayo Clinic Board of Governors, the Executive Operations Teams and members of the Mayo Clinic Health System.

The Conflict of Interest Review Board shall document its reviews and determinations and, if applicable, its COI management plans, which shall specify the actions that have been, and/or shall be, taken to manage the Institutional COI.

A statement will be included in patient information materials received by all patients acknowledging that Mayo Clinic has institutional relationships with medically-related commercial entities. These relationships may result from licensing agreements, institutional partnerships or leadership activities.

Patients will be informed that if they have questions about potential Institutional COIs, they may contact the Office of Conflict of Interest Review for general information about Mayo Clinic's institutional relationships with commercial entities.

An additional statement will clarify for patients that Mayo Clinic receives no royalties on the sale of items invented at Mayo Clinic that are prescribed for Mayo Clinic patients.

Policy Notes

N/A

Related Procedures

N/A

Related Documents

[Board of Directors and Corporate Officer Membership Policy](#)

[Conflict of Interest in Clinical Practice Policy](#)

[Conflict of Interest in Development Activities Policy](#)

[Conflict of Interest in Education Policy](#)

[Conflict of Interest in Entrepreneurship Activities Policy](#)

[Conflict of Interest in Investments Policy](#)

[Conflict of Interest in Leadership Policy](#)

[Conflict of Interest in Professional Activities Policy](#)

[Conflict of Interest in Purchasing Policy](#)

[Conflict of Interest in Research Policy](#)

[Trustee Conflict of Interest Policy](#)

Definitions

Conflict of Commitment: A conflict of commitment refers to a situation where an employee engages in external activities, either paid or unpaid, that interfere with his/her obligation and responsibilities to the institution. Employees should evaluate and arrange their external interests in order to avoid conflicts of commitment that would compromise their ability to carry out their obligations to the institution.

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

Institutional Conflict of Interest: An institutional conflict of interest (Institutional COI) describes a situation in which the financial interests of an institution or an institutional official, acting within his or her authority on behalf of the institution, may affect or appear to affect the research, education, clinical care, business transactions, or other activities of the institution. Institutional conflicts of interest are reviewed and managed by the Mayo Clinic Conflict of Interest Committee.

Institutional Conflict of Interest (Research): An Institutional Conflict of Interest in Research may occur whenever the financial interests of the institution, or of an institutional official who has authority to act on behalf of the institution, might affect, or reasonably appear to affect, institutional processes for the design, conduct, reporting, review, or oversight of the research.

Personnel: Includes institutional officials, consulting staff, staff physicians, scientists, visiting scientists, appointees, research temporary professionals, residents, fellows, students, and allied health staff that work in Mayo Clinic facilities or are involved in any Mayo Clinic program or activity.

References

N/A

Owner

Monica Sveen-Ziebell on behalf of the Conflict of Interest Review Board

Contact

Monica Sveen-Ziebell, Administrator

Revision History

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Mayo Clinic Board of Governors: 5/18/2020

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Workflow Reviewer Name(s): Graner, Timothy M.

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

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Comments: 12/03/2021 Per Tim Graner, London is now added as an applicable site for this document.

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