Conflicts of Interest in Evidence-Based Guidelines: Issues and Solutions

Institute of Medicine

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The Basic Question

• How do we get the Right Information, to the Right People at the Right Time?
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<th>Guidelines are expensive</th>
<th>Funding is scarce</th>
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<td>Experts provide credibility</td>
<td>Experts often have conflicts or biases</td>
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<td>Without compensation, only those who need and want publications (academics) can volunteer for this large commitment</td>
<td>Most academics have conflicts and biases</td>
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<td>If industry support is accepted</td>
<td>It could lead to bias or perception of bias</td>
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The ACCP policy on conflict of interest established firewalls:

- All fund development activities are done thru the Executive Office without participation or knowledge of HSP Leadership or staff.

- Financial support must be unrestricted & the funds are invested into a rigorous methodological process & operational costs for guideline development.

- ACCP strives for at least 3 sponsors if any industry sponsorship and often has 3-5.

  β Nearly 1/3 of guidelines in past 7 years had no external support.

Continued
Firewalls (con’t):

- **Sponsors are not revealed to:**
  - HSP Committee members
  - Panel chairs and panelists
  - Project managers

- **Sponsors do not nominate or even know**
  - Panelists
  - Subtopics
  - Research questions
  - Evidence review centers or methodologists
  - Reviewers
Firewalls (con’t):

- Pharmaceuticals mentioned in the guidelines are referred to by their generic names only
- Sponsors do not know when or where meetings or conference calls are held and never attend any meetings or calls
- Sponsors never see any drafts and only see the final published version after publication embargo is lifted
- If industry support, then fully disclosed to readers and attendees at educational programs
ACCP/HSP Conflict of Interest Process

1. Initial Disclosures and Vetting:
   During the guideline panel member nomination phase

2. Subsequent Disclosures and Vetting:
   Prior to all face-to-face meetings

3. Reviewers’ Disclosures and Vetting:
   Disclosures of all individuals appointed as reviewers

4. Final Disclosures:
   Updated at time of submission for publication
ACCP Conflict of Interest Evaluation Process

- **Conflict of Interest Disclosure Form Completed**
- **Yes**
  - **Participation permitted**
  - Individual has nothing to disclose, evaluation completed
- **No**
  - Individual Prohibited from Participation

**Individual has a conflict of interest to disclose**
Review by Policy and Procedures Subcommittee, Chair, Vice-Chair, and/or other designee and presented to full HSP Committee

- **Recommendation 1**: Participation Permitted
  - COI not a source of bias
- **Recommendation 2**: Participation permitted
  - With precepts to preclude bias
- **Recommendation 3**: Unacceptable
  - Member is prohibited from participation
- **Recommendation 4**: Referral to ACCP Executive Committee
Solutions: Conflicts of Interest Policy

- **No honoraria for guideline panelists**

- **Disclosures are publicly listed for all panelists in conference packets at each in-person meeting**
  - **Conflicted panelists must recuse themselves from both the discussions and voting on topics in which they have conflicts**

- **Extensive reviews of manuscripts including reviewing for biases or perception of biases**
Where do we go from here:

- Constantly reassessing all policies and procedures on an annual basis
- Formalizing a checklist for reviewing disclosures
- Review of funding by the new Development Oversight Committee
- Review the roles of methodologists, *ie*, as the Panel Chair, Chapter Editor, and Lead Author
- Need to consider biases that might be built into the evidence base (*eg*, clinical trials) and what can be done to identify such biases and eliminate them from the evidence base?

ACCP endeavors to face the challenges and manage them with ever-evolving solutions