# COCHRANE'S NEW CONFLICT OF INTEREST POLICY: HOW DO I DEAL WITH "NON-FINANCIAL" INTERESTS?

— Quinn Grundy PhD RN —

#### Disclosures

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I have no conflicts of interest.

I was a project board member on the Cochrane COI Policy Revision (2018-2019).

I am a co-author on a Cochrane EPOC review.

## Objectives

- Identify the nature and range of so-called "non-financial" interests
- Understand the impetus for this policy development
- Evaluate when an interest constitutes a conflict of interest
- Propose ways of thinking about and prioritizing the identification and management of 'interests'

# What is a "non-financial" conflict of interest?

### An implementation challenge

"Other, non-financial interests may result in a conflict of interest that could influence the development of Cochrane Library content...

The types of interests that should be considered, and declared, include, but are not limited to:

- published opinions
- work as a health professional or advisor on the topic
- any affiliation to an organization that has a [relevant] declared ideological or political opinion"

#### Defining the phenomenon

- Grief over death of a pet<sup>18</sup>
- Achieving fame, 19 status, 2 reputation, prestige, influence, or power
- Fulfillment of a desire to do good
- Personal sense of worth<sup>19</sup>
- Religious beliefs<sup>2</sup>
- Membership in a religious organisation
- Political views<sup>20,21</sup>
- Sexuality<sup>21</sup>
- "Exercises every day and is heavy into exercise"
- Dietary preferences or non-nutritional interventions "that are specific, circumscribed, and adhered to strongly"<sup>13</sup>
- Having a medical condition that may benefit from the drug being considered for subsidy<sup>5</sup>
- Personal antipathy
- Rivalry or cronyism
- History of collaboration
- Family members' disease conditions including hereditary conditions
- Personal relationships,<sup>2</sup>
   (e.g. working with spouse)
- Concern for the well-being of family or friends<sup>2</sup>
- Defense of others with parallel or overlapping interests; "gangs"
- Familiarity and comraderie;
   "we are all part of the same club"<sup>22</sup>

- A "clearly expressed," "published opinion," or comment on the topic
- Advocacy or policy positions on the topic under study<sup>9</sup>
- Substantial career effort or interest within the guidelines or review topic area
- "Strongly held beliefs" related to a guidelines or review topic area
- Fanaticism about a single issue<sup>20</sup>
- "Excessive zeal of an investigator in trying to complete a study"<sup>24</sup>
- Researcher allegiance to psychological therapy<sup>27</sup>
- Disciplinary conflicts

   (among specialties or schools of thought)<sup>28</sup>
- Leadership role on a related guidelines panel or committee
- Authors of clinical practice guidelines on topic for which they're now doing a systematic review
- Authorship of a previous systematic review on the same topic<sup>9</sup>
- Authorship of published primary studies included in a systematic review 9,25
- Serving as a peer reviewer on a competing study or review

- Using editorial role to shape a study and its interpretation in favour of one's views
- "Confluence of thinking" resulting from review
   leaders and technical experts being of the same specialty
- Bias towards pre-clinical animal models that are more accessible but less relevant to human health
- Advocacy positions
- Membership in an advocacy organisation<sup>20</sup>
- Desire to align with other organisations (e.g. aligning guideline with the CDC)
- Desire to maintain political power or leadership position
- Influence of political actors, including lobbyists, over systematic review or guideline processes (e.g. systematic review not favourable to lobbyist's position so review is "buried in the basement" when the reviewers won't alter the findings)
- "Careerism"<sup>23</sup> or career development
- Academic currency in the form of publications and grants,<sup>24</sup> prestigious prizes, or speaking invitations
- Medical specialty<sup>25,26</sup>

- Special qualification in a psychological therapy<sup>27</sup>
- Memberships of professional organisations
- Conference attendance
- Invitations (or return invitations) to serve on committees or guideline panels
- Dual-role relationships (e.g. recruiting one's own patients to a clinical trial)
- Relationships with government or health care organisations (e.g. employees of Kaiser or the Veterans Administration are "believers")
- Geographic or affiliation bias<sup>28</sup>
- Service to another
   organization that overlaps
   with the mission of the
   guidelines organization
- Acting as chair or unpaid consultant for relevant organization
- Opportunity to publish in a peer-reviewed journal
- Future success in obtaining grant funding for research
- Professional accolades for obtaining a positive outcome from a particular clinical trial<sup>19</sup>
- Long service to government committees or private insurers (e.g. a cost-limiting bias)<sup>29</sup>

#### **CONFLICTS OF INTEREST**

- Global health philanthropy for a research program or review for a certain intervention (feels conditional)
- Consulting for pharmaceutical companies that manufacture medications you study at levels below the threshold for reporting or NIH definition of conflict of interest
- Uncompensated relationships with companies
- Receipt of industrysponsored meals or gifts
- Academic is a company partner; directs support from the grant to company
- Evaluating one's own proprietary (nonpharmacological) intervention (especially if you sell accredited training, books, or manuals)<sup>13,30</sup>
- Sale of books or programs based on one's nutrition or dietary research<sup>13</sup>
- Clinical income derived from a particular procedure or intervention <sup>25,29</sup>
- Employment

#### Policy in context

**AHRQ US Preventive** 

Services Task Force

**American Thoracic** Society

NICE

GIN

**CHEST** 

WHO

**BMJ** 

PLoS journals

Nature

National Academies of Science

American College of Physicians

Royal Aus College of Physicians

NHMRC

ICMJE

JAMA

Cochrane

IOM

#### The status quo



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ORIGINAL ARTICLE

#### Two Phase 3 Trials of Adalimumab for Hidradenitis Suppurativa

Alexa B. Kimball, M.D., M.P.H., Martin M. Okun, M.D., Ph.D., David A. Williams, M.D., M.P.H., Alice B. Gottlieb, M.D., Ph.D., Kim A. Papp, M.D., Ph.D., Christos C. Zouboulis, M.D., Ph.D., April W. Armstrong, M.D., Francisco Kerdel, M.D., Michael H. Gold, M.D., Seth B. Forman, M.D., Neil J. Korman, M.D., Ph.D., Evangelos J. Giamarellos-Bourboulis, M.D., Ph.D., Jeffrey J. Crowley, M.D., Charles Lynde, M.D., Ziad Reguiai, M.D., Errol-Prospero Prens, M.D., Ph.D., Eihab Alwawi, B.S., Nael M. Mostafa, Ph.D., Brett Pinsky, Ph.D., Murali Sundaram, Ph.D., Yihua Gu, M.S., Dawn M. Carlson, M.D., M.P.H., and Gregor B.E. Jemec, M.D., D.M.Sc. N Engl J Med 2016; 375:422-434 | August 4, 2016 | DOI: 10.1056/NEJMoa1504370

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#### Conflicts of interest



# Primary interest

In WHO guidelines, the **primary interest** is to serve WHO's Member States by producing recommendations that improve the health and well-being of populations, globally or in specific areas or countries.

- WHO Handbook for Guideline Development (2014)

# What is the primary interest for Cochrane authors and editors?



#### Ethical shorthand

"Conflict of interest" served as shorthand for concerns that:

- Strong beliefs might preclude open-mindedness
- Personal beliefs might override evidence-led decisions
- Judgment inevitably arises from a paritcular perspective
- Outcomes are sometimes unfair (e.g. peer review)

## A policy gap

- A mismatch between underlying concerns and policy tools
- Unintended consequences
  - Ethical and legal considerations (i.e. privacy)
  - Representation and diversity
  - Stigma and exclusion
  - "Don't know and don't care"

# Safeguarding integrity

- Independence
- Freedom from interference
- Assurance
- Transparency

### Beyond disclosure





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#### An example

**Cochrane Database of Systematic Reviews** 

# Information and promotional strategies by pharmaceutical companies for clinicians

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Lisa Bero

#### Recruitment

We are writing to invite you to participate in a project which aims to explore how non-financial interests are identified, disclosed and managed in the context of biomedical research.

- Seeking the perspective of policy implementers
  - Managing editors
  - Guidelines secretariat
- ~60 minute individual interview by tele/videoconference
- Interested in experiences implementing conflict of interest policy in your day-to-day work

If interested, please email quinn.grundy@utoronto.ca and feel free to pass this along!

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#### Resources

#### **Publications:**

A comparison of policy provisions Acct Res 10.1080/08989621.2020.1748015

Conflict of interest as ethical shorthand *J Clin Epi* 10.1016/j.jclinepi.2019.12.014

Why having a (nonfinancial) interest is not a conflict of interest *PLoS Bio* 10.1371/journal.pbio.2001221

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