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# **BMJ Open**

### Financial conflicts of interest of clinicians making submissions to the panCanadian Oncology Drug Review: a descriptive study

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6	2	<b>Oncology Drug Review: a descriptive study</b>
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52 53	23	Key words:
54 55 56	24	financial conflict-of-interest, panCanadian Oncology Drug Review, clinician, oncology,
57 58	25	medicines, funding recommendation
59 60	26	Word count:

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2 3 4	29	Structured Summary
5 6	30	Objectives
/ 8 9	31	This study examines financial conflict-of-interest (COI) of clinicians involved in oncology
10 11	32	research and treatment who make submissions to the panCanadian Oncology Drug Review
12 13	33	(pCODR) about whether drug-indications should be publicly funded.
14 15 16	34	Design
17 18	35	Descriptive study
19 20 21	36	Data sources
22 23	37	Website of panCanadian Oncology Drug Review
24 25	38	Interventions
26 27 28	39	None
29 30	40	Primary and secondary outcomes
31 32	41	Number of submissions declaring financial conflicts with all drug companies and companies
33 34 35	42	making the drug in question from date of publication of final report - October 2016 to
36 37	43	February 2019. Number of times where clinicians agreed and disagreed with preliminary
38 39 40	44	recommendation from pCODR. The distribution of agreement/disagreement was compared
40 41 42	45	for each of the three possible funding recommendations.
43	40	Results
44 45 46	47	There were 46 drug-indication reports from pCODR and clinicians made 261 submissions.
47 48	48	They declared payments from companies 323 times and named 38 different companies a total
49 50	49	of 500 times. Financial conflicts with drug companies were declared in 176 (66.3%) of all
51 52 53	50	submissions. In 21 (45.7%) of the 46 drug-indications, 50% or more of the clinicians had a
54 55	51	conflict with the company making the drug. There were 37 preliminary recommendations that
56 57 58	52	clinicians commented on. In all 25 where pCODR recommended funding or conditional
59 60	53	funding the clinicians either agreed or agreed in part. Twelve times pCODR recommended

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#### 55 recommendation p < 0.0001 (Fisher exact test).

#### 56 Conclusion

- 57 Financial onflicts with pharmaceutical companies are widespread among experts making
- 58 submissions to the pCODR.
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60	Article Summary
61	Strengths and limitations of this study
62	• Descriptive study of financial conflict-of-interest (FCOI) of clinicians making
63	submissions to the panCanadian Oncology Drug Review (pCODR).
64	• All clinician submissions evaluated from time of publication of final pCODR report -
65	October 2016 to February 2019.
66	• Evaluation of whether clinicians agreed or disagreed with preliminary funding
67	recommendations.
68	• Results only apply to oncology clinicians making submissions to pCODR.
69	• No data available to determine if FCOI affect clinicians' views about funding.
70	

2 3	71	•	Acknowledgements
4 5 6	72	•	Catherine Oliver verified data extraction.
7 8	73	•	Competing Interests
9 10 11	74	•	In 2016-2019, Joel Lexchin was a paid consultant on two projects: one looking at
12 13	75		developing principles for conservative diagnosis (Gordon and Betty Moore Foundation)
14 15	76		and a second deciding what drugs should be provided free of charge by general
16 17 18	77		practitioners (Government of Canada, Ontario Supporting Patient Oriented Research
19 20	78		Support Unit and the St Michael's Hospital Foundation). He also received payment for
21 22	79		being on a panel at the American Diabetes Association, for a talk at the Toronto
23 24 25	80		Reference Library, for writing a brief for a law firm and from the Canadian Institutes of
26 27	81		Health Research for presenting at a workshop on conflict-of-interest in clinical practice
28 29	82		guidelines. He is currently a member of research groups that are receiving money from
30 31 32	83		the Canadian Institutes of Health Research and the Australian National Health and
33 34	84		Medical Research Council. He is member of the Foundation Board of Health Action
35 36	85		International and the Board of Canadian Doctors for Medicare.
37 38 39	86	•	Funding
40 41	87	•	This research received no specific grant from any funding agency in the public,
42 43	88		commercial or not-for profit sectors.
44 45 46	89	•	Data sharing statement
47 48 49	90 91	•	Data available from the Dryad Digital Repository: doi:10.5061/dryad.3k2c3s7.
50 51 52	92	•	Contributorship statement
52 53 54	93	٠	JL came up with the idea for this study, gathered and analyzed the data and wrote the
55 56	94		manuscript.
57 58 59 60	95		

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2 3 4	96	
5 6	97	Introduction
7 8 0	98	Canada has no national drug formulary and as a result, the federal, provincial and territorial
) 10 11	99	governments (except for Quebec) cooperate through the Canadian Agency for Drugs and
12 13	100	Technology in Health (CADTH) to make recommendations about whether to fund unique
14 15 16	101	drug-indication combinations. Specifically, the panCanadian Oncology Drug Review
10 17 18	102	(pCODR), an arm of CADTH has been doing this for oncology products starting in January
19 20	103	2012 (1). Briefly, pCODR accepts applications from manufacturers and drug plans and then
21 22	104	utilizes an expert panel (2, 3) that considers the clinical evidence, plus input from
23 24 25	105	manufacturers, clinicians and patient groups in making its recommendations about whether
26 27	106	the plans should list drugs for specific indications.
28 29 30	107	
31 32 33	108	Since October 2016, pCODR has published input from registered clinicians defined as
34 35	109	practising oncologists or physicians who treat cancer patients, oncology pharmacists and
36 37	110	oncology nurses. "Oncologists or physicians who treat cancer patients can provide their input
38 39 40	111	as an individual submission or jointly in a group submission. Oncology pharmacists and
40 41 42	112	oncology nurses provide invaluable information on drug preparation and administration, and
43 44	113	are eligible to provide input as part of a joint submission with a lead oncologist" (4). Part of
45 46 47	114	the process of registering is completing a financial conflict of interest (FCOI) form (5). Once
47 48 49	115	registered clinicians receive notifications via email of all upcoming reviews at pCODR. The
50 51	116	email notification has information pertaining to the drug and indication under review, the link
52 53 54	117	to the clinician input template, and the deadline date for submitting input.
55 56 57	118	In the United States, financial conflict of interest are associated with the voting patterns of
58 59 60	119	members of Food and Drug Administration (FDA) advisory committees (6) but there has not

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been any analysis of FCOIs of clinicians' input into funding recommendations. This study
was undertaken to examine the FCOIs of clinicians making inputs into the pCODR process.

123 Methods

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124 Source of data

Reports from pCODR are available at <a href="https://www.cadth.ca/pcodr/find-a-review">https://www.cadth.ca/pcodr/find-a-review</a>. Reports were included if a final recommendation had been issued as of February 22, 2019 and if they included a submission from one or more clinicians. Applications from manufacturers where they were requesting a reconsideration of a previous decision or where they were requesting funding for a different drug-indications for the same drug were included and treated as separate applications. Besides allowing clinicians to make inputs to pCODR, they are also allowed to comment on preliminary decisions.

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## 133 Information extracted from pCODR reports

From each report the following information was extracted: generic and brand name of drug,
indication, company manufacturing the drug, preliminary and final recommendations about
funding and whether the clinicians agreed, agreed in part or disagreed with the preliminary
recommendation about funding – fund, fund based on conditions being fulfilled, e.g., the
drug being cost effective or budgetary effects being taken into consideration and do not fund.

<sup>8</sup> 139 FCOI forms contain the name of the clinicians and ask them to declare payments received
 <sup>9</sup> 140 within the previous two years for one or more of ten types of activities: advisory role

141 (advisory board and/or health technology advice), conference attendance, gifts, honoraria,

142 royalties, program or operating funding (e.g., website), research/educational grants,

sponsorship of events, travel grants and other. In addition, clinicians need to give the names

 $_{0}$  144 of companies making the payments and the amounts of the payments. Clinicians also need to

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list whether they have received or are in possession of stocks or options of more than \$10,000 (excluding mutual funds) for organizations that may have a direct or indirect interest in the drug under review and whether they have personal or commercial relationships either with a drug or health technology manufacturer (including such manufacturer's parent corporation, subsidiaries, affiliates and associated corporations) or other interest groups. Information on all of these categories was extracted and put into an Excel spreadsheet. The status of the clinician making the submission, i.e., physician, pharmacist, etc., is not contained in the FCOI statement and the amounts of money received from each company is blacked out. Information was extracted by the author and verified by CO, a retired general practitioner. Disagreements were resolved by discussion. Analyses of information from pCODR reports Counts were made of the following: number of individual drug-indication reports from pCODR along with the number of clinicians making submissions per drug-indication, how many drug companies each clinician had a conflict with, whether they had a conflict with the company making the drug, a conflict with another drug company or had no declared conflicts with companies and the number of paid activities for drug companies each clinician reported when they made a submission. Based on this data, the number of submissions where a majority of clinicians had a conflict with any drug company and a conflict with the company making the drug was calculated. In addition, the number of different submissions from each clinician was totaled. Finally counts were made of the number of times a clinician reported stocks or options and personal or commercial relationships. 

If a clinician or group of clinicians made a comment about the preliminary recommendation –

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> agree, agree in part, disagree - the distribution of the type of comment was compared for each 168 169 of the three possible funding recommendations. 170 171 *Statistics* 172 Agreement between views of clinicians about preliminary recommendations and the 173 recommendations from pCODR were compared using Fisher's exact test. Prism 7.0d for 174 Macintosh (GraphPad Software Inc.) was used for statistical testing. 175 176 Patients and ethics No patients were involved in this study and all data was publicly available and therefore 177 178 ethics approval was not necessary. 179 180 **Results** 181 There were reports for 46 drug-indications and clinicians made 261 submissions for these 46 drug-indications. Financial conflicts with drug companies were declared in 176 (66.3%) of all 182 183 submissions; 119 times (45.6%) conflicts were with the company that made the drug under 184 consideration, 52 times (19.9%) with another company and in 5 cases (1.9%) the name of the 185 company was missing. In 78 cases (29.9%) clinicians did not declare any conflict and in 7 186 cases (2.7%) it was not known if a conflict existed because all of the information was missing 187 (Table 1). In 33 out of the 46 (71.7%) drug-indications, 50% or more of the clinicians making 188 a submission had a conflict with one or more drug companies and in 21 (45.7%) of the 46, 189 50% or more of the clinicians had a conflict with the company making the drug 190 (Supplementary File 1). 191 Table 1: Number (percent) of clinicians declaring financial conflicts with companies and 192 payments for activities

	Status of confli	ct declared by	Number of	Number of	Number of
	clinician	et declai eu by	clinician	times	montions of
	Chinician		culturi	unics	acompanies that
				payments	companies that
			(percent all	declared for	clinicians nad
			261	activities	conflict with
			submissions)	(percent all	(percent all
				payments)	mentions)
	Number of		173 (66.3)	323	500
	submissions				
	with conflicts				
	declared				
		Conflict with	119 (45.6)	232 (71.8)	345 (69.0)
		company			
		marketing drug			
		Conflict with	52 (19.9)	81 (25.1)	155 (31.0)
		another			× ,
		company			
		Conflict	5(1.9)	10 (3.1)	
		declared but			
		company not	0		
		named			
	Number of		78 (29.9)	0	0
	submissions		(10(1))		
	declaring no				
	conflict				
	Number of		7 (2 7)		
	submissions		/ (2.7)		
	where conflict				
	declaration				
	missing				
01	missing				
74					
05	Clinicians declare	ed navments 373 tir	nes in the 10 differ	rent categories of	activities. 737
/5	Chine and deciare	a payments 525 th	lies in the 10 differ	tent categories of a	activities, 252
6	(71.8%) ware dec	lared by clinicians	with a conflict wit	h the company me	king the drug and
70	(71.870) were det			in the company ma	iking the drug and
7	81(25,10/) word	doolarad by aliniaia	ne who had confli	ote with other cor	manias (Tabla 1)
' /	of (23.170) were	declared by chillera		cts with other con	ipallies (Table T).
0	Clinicians had as	nfliata with a maan	of 2.0 drug commo	nias and norform	d a map af 10
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n	activities for whi	h there would I	)	na in an adminant	nala uvana daalamad
9	activities for which	en they were paid. I	ayments for servin	ng in an advisory	role were declared
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U	151 times and for	the receipt of nonc	oraria 88 times. Pay	yments for other ty	ypes of activities
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1	occurred less offe	en (Table 2). Some	cinnicians declared	receiving paymer	its for different types
$\mathbf{n}$					
02	of activities for different companies in different submissions.				
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	Type of activit y	Adviso ry role	Confer ence attend ance	Gifts	Honor aria	Progra m or operat ing fundin g	Resear ch/edu cation al grants	Royalt ies	Travel grants	Spons orship of events	Other
	Numb er of times payme nt receive d	151	16	0	88	2	32	0	10	17	7
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]	ranging	from Me	rck with	57 men	tions to 8	8 compan	ies with	a single	mention	(Supple	mentary
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	on this to	opic was	missing	in 31 o	ut of 261	(11.9%)	other su	bmissior	s. There	were 4	
1	declarati	ons of a	personal	or com	mercial r	elationsh	ip and ir	nformatio	on was n	nissing 3	3 times
(	out of 26	51 submi	ssions (1	2.6%).	Individua	al clinicia	ins made	between	n 1 and 1	0 separa	te
out of 261 submissions (12.6%). Individual clinicians made between 1 and 10 separate											
	suomissi	ions (Tat	ole 5).								
		<b>N</b> 7 <b>N</b>	er of indi	ividual	submissi	ons per	clinician	1			
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In all 25 cases where pCODR recommended funding or conditional funding the clinicians

either agreed or agreed in part. Twelve times pCODR recommended that the drug-indication

not be funded and 9 times clinicians disagreed with that recommendation, in one case they

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agreed and in two cases they agreed in part (Table 4). The distribution of clinician responses

220 in relation to the three funding recommendations from pCODR was statistically significantly

different, p < 0.0001 (Fisher exact test). In one case the pCODR changed its preliminary do

222 not fund recommendation to a final conditional fund recommendation.

## Table 4: Clinician response to preliminary recommendation from panCanadian0ncology Drug Review

		Preliminary reco Oncology Drug	ommendation from Review	m panCanadian
	0	Fund	Fund with conditions or criteria	Do not fund
<b>Response from</b>	Agrees	1	17	1
clinicians	Agrees in part	0	7	2
	Disagrees	0	0	9

p < 0.0001, Fisher exact test

### 229 Discussion

The results of this study show that two-thirds of the clinicians who make submissions to the 230 231 pCODR have FCOI with one or more pharmaceutical companies and almost half have FCOI 232 with the company making the product that is being considered for public funding. The 233 amount of money that clinicians received for their activities on behalf of the companies is not 234 known as that information is blacked out on their FCOI declaration forms. In over 70% of the 235 drug-indications being reviewed by the pCODR the majority of clinicians making 236 submissions had conflicts. The largest number of activities for which physicians were paid 237 was serving in an "advisory role", but exactly what this means is not clarified in the FCOI 238 documents that are made public and it is possible that this term was interpreted differently by .39 individual clinicians.

The level of COI revealed in this study is greater than that reported in a 2015 survey ofCanadian physicians, where 46% said that they had been retained by a pharmaceutical

company in some capacity at some point in their career (7). It is also substantially larger than the level of FCOI of people serving on FDA advisory committees. These are committees convened by the FDA to vote on whether the FDA should approve new drug applications. An analysis of 379 meetings held over 15 years by 15 committees found that the median level of meeting "conflictedness" (percentage of individuals with a reported financial conflict of interest) was around 13% (range 2% to 29%). On average, committees reported that half of their meetings were attended by at least 1 person with a financial conflict (6).

An additional issue that this study identified was that there is missing information in a substantial number of FCOI declarations. Statements about stock ownership were not completed 11.9% of the time and those about a personal or commercial relationship were not completed 12.6% of the time. These omissions raise the question about whether these declarations are just pro forma, i.e., a piece of paper to be filled out and then ignored by the 4° pCODR.

Two important questions are whether the conflicts held by the clinicians influenced their view about the drug-indication being considered and whether the conflicts influenced the final decision by the pCODR. pCODR does not publish the submissions from the clinicians but summarizes them in its reports and does not necessarily attribute views to individual people or groups in the case of a group submission. Therefore, when there are submissions from more than one individual clinician or groups of clinicians it is generally not possible to link views about a drug-indication (positive, neutral, negative) to the COIs of individuals or groups. However, the finding that 75% of the time when the preliminary recommendation of the pCODR was not to fund the drug, that some of the clinicians making submissions disagreed with the decision might indicate that their conflicts did determine their views about

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268 the product. This suggestion needs to be tempered by a couple of points. First, clinicians may 269 have held favourable views about the drug-indication before their relationship with a drug 270 company started. Second, there can be a legitimate argument about whose views of the drug-271 indication were more accurate, those of the clinicians or those of the pCODR.

273 As to whether or not the clinicians had an influence on the final recommendation of the 274 pCODR, it may be relevant that the pCODR only changed its recommendation from do not 275 fund to fund with conditions in one out of the 9 cases where the clinicians disagreed with the 276 preliminary decision. Removing all of the FDA advisory committee members with conflicts 277 would have produced margins less favourable to the drug being considered in the majority of 278 meetings, but this would not have changed whether the majority favoured or opposed the 279 drug (8).

In Australia, the Pharmaceutical Benefits Advisory Committee (PBAC) serves somewhat the 281 282 same role as the pCODR (9). In making submissions to the PBAC, companies are able to recruit experts to provide an opinion about their drug and the sponsors have to provide a 283 284 signed statement from each expert about their FCOIs (10). However, the FCOI documents 285 from these experts are not publicly available so their degree of FCOI cannot be compared to 286 that of experts giving input to pCODR.

288 The literature about whether disclosure of FCOI affects trust in individual doctors, the 289 pharmaceutical industry and the healthcare system in general is mixed. A systematic review 290 about the impact of disclosing financial ties in research and clinical care, found that patients 291 believe that these influenced professional behaviour, decreased the quality of research 292 evidence and should be disclosed (11). More recently, one study reported that when patients

knew believed that a gift relationship existed, they had lower levels of physician trust and higher rates of health care system distrust (12). While the level of payments affected perceptions of honesty and fidelity in individual physicians, viewing an online disclosure database did not affect patients' trust ratings for the medical profession or the pharmaceutical industry (13). Patient attitudes about FCOI in cancer research seems to be more forgiving. Most patients in cancer-research trials were not worried about FCOI between researchers and drug companies and would still have enrolled in the trial if they had known about these relationships (14). The only Canadian study on patients' attitudes found that public opinions on physician-pharmaceutical industry interactions differ depending on the scenario but suggested a significant level of concern regarding interactions involving direct financial benefit to physicians (15). Whether the conflicts held by clinicians leads to a public perception that the pCODR process is biased is a question that this current study cannot answer but should be the subject of further research. 4.0

Limitations

These results about the presence of conflicts only apply to clinicians making submissions about funding oncology drugs and the distribution of conflicts among other clinicians treating cancer who did not make a submission may be different. Similarly, the results may not apply to clinicians treating other diseases. Clinicians did not comment on 9 out of 46 preliminary recommendations. Whether they agreed with the final recommendation from pCODR is not known although it seems unlikely that they would have changed their views between the preliminary and final recommendations. The main strength of this study is that it looked at the entire population of recommendations from pCODR where clinicians made a submission about the drug-indication being considered.

2 3	318	Conclusion
4 5 6	319	Conflicts with pharmaceutical companies are widespread among experts making submissions
7 8	320	to the pCODR. Information about how much experts are reimbursed for the activities that
9 10	321	they undertake on behalf of companies is not disclosed by pCODR and attributing views to
11 12	322	individual clinicians or groups of clinicians cannot be done since only summaries of the
13 14 15	323	submissions are published. Publishing full submissions and the amounts that clinicians
15 16 17	323	receive may help in determining any association between payments and clinicians' views
18 19	224	receive may help in determining any association between payments and ennicians views.
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## Supplementary File 1: Number (percent) of clinicians with drug company conflicts per drug-indication

Generic name*	Number of clinicians making submission	Number (percent) of clinicians with conflict with any company	Number (percent) of clinicians with conflict with company making
alaaangara	10	7 (70)	drug
	10	/ (/0)	4(40)
alectinib	4 0	4(100)	0(0)
anelutamida	0	(87.3)	$\frac{2(23)}{8(80)}$
apaiutamide	10	9 (90)	8 (80)
atezonzumao	8	0(7)	1(12.5)
hlimatumanah	3	3(100)	1(20)
blinatumomab	2	1(50)	1(50)
	1	1(100)	1(100)
brentuximab vedotin	5	2(40)	1(20)
cabozantinib	3	2 (66.7)	
carfilzomib	4	3(75)	2 (50)
ceritinib	3	3 (100)	3 (100)
trametinib &	9	7 (77.8)	4 (44.4)†
daratumumab	8	7 (87.5)	6 (75)†
daratumumab	9	9 (100)	8 (88.9)
fulvestrant	4	1 (25)	0 (0)
ibrutinib	1	1 (100)	1 (100)
inotuzumab	5	2 (40)	2 (40)
ozogamicin			
irinotecan liposome	6	4 (66.7)	2 (33.3)
ixazomib	6	5 (83.3)*	5 (83.3)*
lenvatinib	5	5 (100)	4 (80)
lenvatinib	7	6 (85.7)	5 (71.4)
midostaurin	4	1 (25)	1 (25)
nivolumab	4	1 (25)	0 (0)
nivolumab	3	1 (33.3)	0 (0)
nivolumab & ipilimumab	5	5 (100)	5 (100)
nivolumab &	4	3 (75)	2 (50)
obinutuzumab	3	2 (66 7)	2 (66 7)
olaparib	7	6 (85.7)	5 (71.4)
olaparib	10	6 (60)	5 (50)
olaratumab	1		0(0)
osimertinib	5	5 (100)	4 (80)
osimertinib	9	7 (77 8)	7 (77 8)
palbociclib	2	1 (50)	1 (50)
panitumumah	16	8 (50)+	$6(37.5)\pm$
nombrolizumah	7	6 (85 7)	3(42.0)

pembrolizumab	6	4 (66.7)‡	2 (33.3)‡
pembrolizumab	10	4 (40)	3 (30)
pembrolizumab	4	2 (50)	1 (25)
pertuzumab-	4	1 (25)	1 (25)
trastuzumab Combo			
Pack			
regorafenib	7	3 (42.9)†	0 (0)‡
ribociclib	2	0 (0)	0 (0)
rituximab	1	0 (0)	0 (0)
trifluridine &	12	3 (25)¶	2 (16.7)¶
tipiracil			
vandetanib	1	1 (100)	1 (100)
venetoclax	11	8 (72.7)	7 (63.6)

\*Some drugs were submitted for different indications or were submitted more than once for the same indication if they were initially refused funding.

+Information about conflicts missing for one clinician.

‡Information about conflicts missing for two clinicians.

¶ Information about conflicts missing for three clinicians.

Name of company	Number of times mentioned
AbbVie	8
Amgen	20
Astellas	8
AstraZeneca	53
Away BioPharma	1
Bayer	6
Boehringer Ingelheim	44
Bristol-Myers Squibb	48
Canadian L	1
Celgene	17
Eisai	10
Eli Lilly	21
EMD Serono	3
ESMO	2
Ferring	2
Genomic H	1
Gilead	3
GlaxoSmithKline	3
Hoffman-LaRoche	34
Immunocore	2
Immunovaccine	1
Ipsen	4
Janssen	34
Johnson & Johnson	4
Karyopharm	1
Lundbeck	4
Merck	57
Merrimack	1
Millenium	2
Novartis	52
Otsuka	1
Pfizer	27
Sanofi Genzyme	8
Seattle Genetics	2
Shire	2
Taiho	2
Takeda	11
Vitalie	1

## Supplementary File 2: Number of times conflict with company mentioned

STROBE Statement-checklist of items that should be included in reports of observational studies

	Item No	Recommendation	Page No
Title and abstract	1	(a) Indicate the study's design with a commonly used term in the title or	1
		the abstract	
		(b) Provide in the abstract an informative and balanced summary of what	2-3
		was done and what was found	
Introduction			
Background/rationale	2	Explain the scientific background and rationale for the investigation being reported	4
Objectives	3	State specific objectives, including any prespecified hypotheses	5
Mathada			
Study design	4	Present key elements of study design early in the paper	5
Setting	5	Describe the setting locations and relevant dates including periods of	5-6
Setting	5	recruitment exposure follow-up and data collection	5-0
Dortiginanta	6	(a) Cohort study. Give the elicibility oritoria and the sources and	
Participants	0	(a) Conort study—Give the englotity criteria, and the sources and	
		Case control study. Cive the elicibility criterie, and the courses and	
		<i>Case-control study</i> —Give the englotity criteria, and the sources and	
		for the choice of case as deservation of the rationale	
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		<i>Cross-sectional study</i> —Give the eligibility criteria, and the sources and	
		(1) C l + ( + ) F + ( + ) ( + ) ( + )	
		(b) Cohort study—For matched studies, give matching criteria and	
		number of exposed and unexposed	
		Case-control study—For matched studies, give matching criteria and the	
		number of controls per case	
Variables	7	Clearly define all outcomes, exposures, predictors, potential confounders,	6-7
		and effect modifiers. Give diagnostic criteria, if applicable	
Data sources/	8*	For each variable of interest, give sources of data and details of methods	5-6
measurement		of assessment (measurement). Describe comparability of assessment	
		methods if there is more than one group	
Bias	9	Describe any efforts to address potential sources of bias	
Study size	10	Explain how the study size was arrived at	
Quantitative variables	11	Explain how quantitative variables were handled in the analyses. If	6-7
		applicable, describe which groupings were chosen and why	
Statistical methods	12	(a) Describe all statistical methods, including those used to control for	6-7
		confounding	
		(b) Describe any methods used to examine subgroups and interactions	
		(c) Explain how missing data were addressed	
		(d) Cohort study—If applicable, explain how loss to follow-up was	
		addressed	
		Case-control study—If applicable, explain how matching of cases and	
		controls was addressed	
		Cross-sectional study—If applicable, describe analytical methods taking	
		account of sampling strategy	
		(e) Describe any sensitivity analyses	1

Continued on next page

Results			
Participants	13*	(a) Report numbers of individuals at each stage of study-eg numbers potentially	7
		eligible, examined for eligibility, confirmed eligible, included in the study,	
		completing follow-up, and analysed	
		(b) Give reasons for non-participation at each stage	
		(c) Consider use of a flow diagram	
Descriptive	14*	(a) Give characteristics of study participants (eg demographic, clinical, social) and	
data		information on exposures and potential confounders	
		(b) Indicate number of participants with missing data for each variable of interest	
		(c) Cohort study—Summarise follow-up time (eg, average and total amount)	
Outcome data	15*	Cohort study—Report numbers of outcome events or summary measures over time	
		Case-control study-Report numbers in each exposure category, or summary	
		measures of exposure	
		Cross-sectional study—Report numbers of outcome events or summary measures	
Main results	16	(a) Give unadjusted estimates and, if applicable, confounder-adjusted estimates and	7
		their precision (eg, 95% confidence interval). Make clear which confounders were	
		adjusted for and why they were included	
		(b) Report category boundaries when continuous variables were categorized	
		(c) If relevant, consider translating estimates of relative risk into absolute risk for a	
		meaningful time period	
Other analyses	17	Report other analyses done-eg analyses of subgroups and interactions, and	
		sensitivity analyses	
Discussion			
Key results	18	Summarise key results with reference to study objectives	9
Limitations	19	Discuss limitations of the study, taking into account sources of potential bias or	1
		imprecision. Discuss both direction and magnitude of any potential bias	
Interpretation	20	Give a cautious overall interpretation of results considering objectives, limitations,	1
		multiplicity of analyses, results from similar studies, and other relevant evidence	1
Generalisability	21	Discuss the generalisability (external validity) of the study results	1
Other informati	on		
Funding	22	Give the source of funding and the role of the funders for the present study and, if	1
		applicable, for the original study on which the present article is based	

\*Give information separately for cases and controls in case-control studies and, if applicable, for exposed and unexposed groups in cohort and cross-sectional studies.

**Note:** An Explanation and Elaboration article discusses each checklist item and gives methodological background and published examples of transparent reporting. The STROBE checklist is best used in conjunction with this article (freely available on the Web sites of PLoS Medicine at http://www.plosmedicine.org/, Annals of Internal Medicine at http://www.annals.org/, and Epidemiology at http://www.epidem.com/). Information on the STROBE Initiative is available at www.strobe-statement.org.

# **BMJ Open**

### Financial conflicts of interest of clinicians making submissions to the panCanadian Oncology Drug Review: a descriptive study

Journal:	BMJ Open
Manuscript ID	bmjopen-2019-030750.R1
Article Type:	Research
Date Submitted by the Author:	02-Jun-2019
Complete List of Authors:	Lexchin, Joel; York University, School of Health Policy & Management
<b>Primary Subject Heading</b> :	Health policy
Secondary Subject Heading:	Pharmacology and therapeutics
Keywords:	financial conflict-of-interest, panCanadian Oncology Drug Review, clinician, medicines, funding recommendations



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4	I	Financial conflicts of interest of clinicians making submissions to the panCanadian						
5 6	2	<b>Oncology Drug Review: a descriptive study</b>						
7	3							
8 9 10	4	Joel Lexchin MSc, MD <sup>1,2,3</sup>						
10 11 12	5	<sup>1</sup> Professor Emeritus						
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20 21	9	University Health Network						
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52 53	23	Key words:						
54 55 56	24	financial conflict-of-interest, panCanadian Oncology Drug Review, clinician, medicines,						
57 58	25	funding recommendation						
59 60	26	Word count:						

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2 3 4	29	Structured Summary
5 6	30	Objectives
/ 8 9	31	This study examines financial conflict-of-interest (FCOI) of clinicians who made
10 11	32	submissions to the panCanadian Oncology Drug Review (pCODR), the arm of the Canadian
12 13	33	Agency for Drugs and Technology in Health that recommends whether oncology drug-
14 15 16	34	indications should be publicly funded. Final reports from pCODR published between October
17 18	35	2016 and February 2019 were examined.
19 20	36	Design
21 22 23	37	Descriptive study
24 25	38	Data sources
26 27	39	Website of panCanadian Oncology Drug Review
28 29 20	40	Interventions
30 31 32	41	None
33 34	42	Primary and secondary outcomes
35 36	43	The primary outcome is the number of submissions declaring FCOI. Secondary outcomes are
37 38 39	44	the number of times where clinicians agreed and disagreed with preliminary recommendation
40 41	45	from pCODR and the association between the distribution of individual clinicians' FCOI and
42 43	46	pCODR's funding recommendations.
44 45 46	47	Results
47 48	48	There were 46 drug-indication reports from pCODR. Clinicians made 261 submissions.
49 50	49	Clinicians declared they received payments from companies 323 times and named 38
51 52	50	different companies making those payments a total of 500 times. Financial conflicts with
53 54 55	51	drug companies were declared in 176 (66.3%) of all submissions. In 21 (45.7%) of the 46
56 57	52	drug-indications, 50% or more of the clinicians had a conflict with the company making the
58 59 60	53	drug. Clinicians commented on 37 preliminary recommendations. In all 25 where pCODR

> recommended funding or conditional funding the clinicians either agreed or agreed in part. pCODR recommended that the drug-indication not be funded 12 times and 9 times clinicians disagreed with that recommendation. The distribution of clinician responses was statistically significantly different depending on whether pCODR recommended funding/conditional funding or do not fund p < 0.0001 (Fisher exact test). The distribution of clinicians' FCOI differed depending on whether the recommendation was fund/conditional fund or do not fund p = 0.027 (Fisher exact test).

#### Conclusion

Financial conflicts with pharmaceutical companies are widespread among experts making

R. submissions to the pCODR.

**Article Summary** 

pCODR.

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Strengths and limitations of this study

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This is the first study to examine financial conflict-of-interest (FCOI) of clinicians

All clinician submissions were evaluated rather than just a sample of submissions.

Results only apply to oncology clinicians making voluntary, unsolicited submissions to

JUTA I. FCOI affe

making submissions to the panCanadian Oncology Drug Review (pCODR).

No data available to determine if FCOI affect clinicians' views about funding.

No independent checking about accuracy of FCOI declarations.

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2 3 4	75	•	Acknowledgements
5 6	76	•	Catherine Oliver verified data extraction.
7 8 9	77	•	Competing Interests
10 11	78	•	In 2016-2019, Joel Lexchin was a paid consultant on two projects: one looking at
12 13	79		developing principles for conservative diagnosis (Gordon and Betty Moore Foundation)
14 15 16	80		and a second deciding what drugs should be provided free of charge by general
17 18	81		practitioners (Government of Canada, Ontario Supporting Patient Oriented Research
19 20	82		Support Unit and the St Michael's Hospital Foundation). He also received payment for
21 22 22	83		being on a panel at the American Diabetes Association, for a talk at the Toronto
23 24 25	84		Reference Library, for writing a brief for a law firm and from the Canadian Institutes of
26 27	85		Health Research for presenting at a workshop on conflict-of-interest in clinical practice
28 29	86		guidelines. He is currently a member of research groups that are receiving money from
30 31 32	87		the Canadian Institutes of Health Research and the Australian National Health and
33 34	88		Medical Research Council. He is member of the Foundation Board of Health Action
35 36	89		International and the Board of Canadian Doctors for Medicare.
37 38 39	90	•	Funding
40 41	91	•	This research received no specific grant from any funding agency in the public,
42 43	92		commercial or not-for profit sectors.
44 45	93	•	Data sharing statement
40 47	04		Evtre data can be appared via the Drugd data repeatery at http://datadrugd.org/with the dai
48	94 95		Extra data can be accessed via the Dryad data repository at http://datadryad.org/ with the doi: https://doi.org/10.5061/dryad.gs/1mg/
49	96		<u>mups.//doi.org/10.5001/dryad.qs4111g4</u> .
50 51 52	90 97	•	Contributorship statement
53 54	98	•	JL came up with the idea for this study, gathered and analyzed the data and wrote the
55 56	99		manuscript.
57 58	100		
59 60	101		

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Introduction

1

Canada has no national drug formulary and as a result, the federal, provincial and territorial

governments (except for Quebec) cooperate through the Canadian Agency for Drugs and

Technology in Health (CADTH) to make recommendations about whether to fund unique

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106	drug-indication combinations. Specifically, the panCanadian Oncology Drug Review
107	(pCODR), an arm of CADTH has been doing this for oncology products starting in January
108	2012 (1). Briefly, pCODR accepts applications from manufacturers and drug plans and then
109	utilizes an expert panel (2, 3) that considers the clinical evidence, plus input from
110	manufacturers and voluntary, unsolicited submissions from clinicians and patient groups in
111	making its recommendations about whether the plans should list drugs for specific
112	indications.
113	
114	Since October 2016, pCODR has published input from registered clinicians defined as
115	practising oncologists or physicians who treat cancer patients, oncology pharmacists and
116	oncology nurses. "Oncologists or physicians who treat cancer patients can provide their input
117	as an individual submission or jointly in a group submission. Oncology pharmacists and
118	oncology nurses provide invaluable information on drug preparation and administration, and
119	are eligible to provide input as part of a joint submission with a lead oncologist" (4). Part of
120	the process of registering is completing a financial conflict of interest (FCOI) form (5). Once
121	registered, clinicians receive notifications via email of all upcoming reviews at pCODR and
122	can voluntarily make unsolicited submissions. The email notification has information
123	pertaining to the drug and indication under review, the link to the clinician input template,
124	and the deadline date for submitting input.

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125 In the United States, FCOI are associated with the voting patterns of members of Food and 126 Drug Administration (FDA) advisory committees (6) but there has not been any analysis of 127 FCOIs of clinicians' input into funding recommendations. This study was undertaken to 128 examine the distribution of FCOIs of clinicians making inputs into the pCODR process. 129 130 Methods 131 Source of data 132 Reports from pCODR are available at https://www.cadth.ca/pcodr/find-a-review. All reports 133 were included if a final recommendation had been issued between October 2016 and 134 February 22, 2019 and if they included a submission from one or more clinicians. 135 Applications from manufacturers where they were requesting a reconsideration of a previous 136 decision or where they were requesting funding for a different drug-indications for the same 137 drug were included and treated as separate applications. Besides allowing clinicians to make 138 inputs to pCODR, they are also allowed to comment on preliminary decisions. 139 Information extracted from pCODR reports 140 141 From each report the following information was extracted: generic and brand name of drug, 142 indication, company manufacturing the drug, preliminary and final recommendations about

143 funding and whether the clinicians agreed, agreed in part (agreed with the overall

recommendation but requested modifications, e.g., expand patient group that should be

145 covered) or disagreed with the preliminary recommendation about funding – fund, fund based

146 on conditions being fulfilled (e.g., the drug being cost effective or budgetary effects being

147 taken into consideration) and do not fund.

FCOI forms contain the name of the clinicians and ask them to declare payments receivedwithin the previous two years for one or more of ten types of activities: advisory role

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#### **BMJ** Open

(advisory board and/or health technology advice), conference attendance, gifts, honoraria, royalties, program or operating funding (e.g., website), research/educational grants, sponsorship of events, travel grants and other. In addition, clinicians need to give the names of companies making the payments and the amounts of the payments. Clinicians also need to list whether they have received or are in possession of stocks or options of more than \$10,000 (excluding mutual funds) for organizations that may have a direct or indirect interest in the drug under review and whether they have personal or commercial relationships either with a drug or health technology manufacturer (including such manufacturer's parent corporation, subsidiaries, affiliates and associated corporations) or other interest groups. Information on all of these categories was extracted and put into an Excel spreadsheet. The status of the clinician making the submission, i.e., physician, pharmacist, etc., is not contained in the FCOI statement and the amounts of money received from each company is blacked out. 

162 Information was extracted by the author in March 2019 and verified by CO, a retired general163 practitioner. Disagreements were resolved by discussion.

### 164 Analyses of information from pCODR reports

Counts were made of the following: number of individual drug-indication reports from pCODR along with the number of clinicians making submissions per drug-indication, how many drug companies each clinician had a conflict with, whether they had a conflict with the company making the drug, a conflict with another drug company or had no declared conflicts with companies and the number of paid activities for drug companies each clinician reported when they made a submission. Based on this data, the number of submissions where a majority of clinicians had a conflict with any drug company and a conflict with the company making the drug was calculated. In addition, the number of different submissions from each

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173 clinician was totaled. Finally counts were made of the number of times a clinician reported174 stocks or options and personal or commercial relationships.

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176 If a clinician or group of clinicians made a comment about the preliminary recommendation – 177 agree, agree in part, disagree - the distribution of the type of comment was compared for each of the three possible funding recommendations. Comments were sometimes made by a group 178 179 of clinicians and in those cases it was not possible to identify specific people to determine 180 their FCOI. Where clinicians submitting comments were named, their FCOI (with the 181 submitting company, with another company or no FCOI) were recorded and the distribution 182 of FCOI was compared depending on whether the recommendation was fund/conditional 183 funding or do not fund. 184 185 **Statistics** 186 Agreement between views of clinicians about preliminary recommendations and the 187 recommendations from pCODR and the distribution of the types of clinicians' FCOI between 188 different funding recommendations were both analyzed using Fisher's exact test. Prism 7.0d 189 for Macintosh (GraphPad Software Inc.) was used for statistical testing. 190 191 Patients and ethics

192 No patients were involved in this study and all data was publicly available and therefore193 ethics approval was not necessary.

<u>,</u> 194

195 **Results** 

There were reports for 46 drug-indications and clinicians made 261 submissions for these 46
 drug-indications. (An additional 10 reports did not include clinician submissions.) Financial

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conflicts with drug companies were declared in 176 (66.3%) of all submissions; 119 times (45.6%) conflicts were with the company that made the drug under consideration, 52 times (19.9%) with another company and in 5 cases (1.9%) the name of the company was missing. In 78 cases (29.9%) clinicians did not declare any conflict and in 7 cases (2.7%) it was not known if a conflict existed because all of the information was missing (Table 1). In 33 out of the 46 (71.7%) drug-indications, 50% or more of the clinicians making a submission had a conflict with one or more drug companies and in 21 (45.7%) of the 46, 50% or more of the clinicians had a conflict with the company making the drug (Supplementary File 1). 

# Table 1: Number (percent) of clinicians declaring financial conflicts with companies and payments for activities

Status of conflic clinician	et declared by	Number of clinician submissions (percent all 261 submissions)	Number of times payments declared for activities (percent all payments)	Number of mentions of companies that clinicians had conflict with (percent all mentions)	
Number of submissions with conflicts declared		173 (66.3)	323	500	
	Conflict with company marketing drug	119 (45.6)	232 (71.8)	345 (69.0)	
	Conflict with another company	52 (19.9)	81 (25.1)	155 (31.0)	
	Conflict declared but company not named	5 (1.9)	10 (3.1)		
Number of submissions declaring no conflict		78 (29.9)	0	0	
Number of submissions where conflict declaration missing		7 (2.7)			

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210 Clinicians declared payments 323 times in the 10 different categories of activities; 232 211 (71.8%) were declared by clinicians with a conflict with the company making the drug and 212 81 (25.1%) were declared by clinicians who had conflicts with other companies (Table 1). 213 Clinicians had conflicts with a mean of 2.9 drug companies and performed a mean of 1.9 214 activities for which they were paid. Payments for serving in an advisory role were declared 215 151 times and for the receipt of honoraria 88 times. Payments for other types of activities 216 occurred less often (Table 2). Some clinicians declared receiving payments for different types 217 of activities for different companies in different submissions.

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219 Table 2: Number of different types of activities for which payments received

Type of activit y	Adviso ry role	Confer ence attend ance	Gifts	Honor aria	Progra m or operat ing fundin g	Resear ch/edu cation al grants	Royalt ies	Travel grants	Spons orship of events	Other
Numb er of times payme nt receive d	151	16	0	88	2	32	0	10	17	7

221 The clinicians declaring conflicts named 38 different drug companies a total of 500 times ranging from Merck with 57 mentions to 8 companies with a single mention (Supplementary 222 223 File 2). There were 5 declarations of stock ownership, all by the same person but information 224 on this topic was missing in 31 out of 261 (11.9%) submissions. There were 4 declarations of 225 a personal or commercial relationship and information was missing 33 times out of 261 226 submissions (12.6%). Individual clinicians made between 1 and 10 separate submissions 227 (Table 3). Table 3: Number of individual submissions per clinician 228

Number of clinicians	Number of individual submissions

Page 13 of 26

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2	30	There were 46 preliminary recommendations from pCODR (33 fund or conditional funding			
2	31	and 13 do not fund) and clinicians commented on 37 of these (25 fund or conditional funding			
2	32	and 12 do not fund). In all 25 cases where pCODR recommended funding or conditional			
2	33	funding the clinicians either agreed or agreed in part. Twelve times pCODR recommended			
2	34	that the drug-indication not be funded and 9 times clinicians disagreed with that			
2.	35	recommendation, in one case they agreed and in two cases they agreed in part (Table 4). The			
2.	36	distribution of clinician responses was statistically significantly different depending on			
2.	37	whether pCODR recommended funding/conditional funding or do not fund p < 0.0001			
2	38	(Fisher exact test). In one case the pCODR changed its preliminary do not fund			
2	39	recommendation to a final conditional funding recommendation as a result of a re-			
24	40	examination of the efficacy and safety information based on the feedback pCODR received			
24	41	from the company, clinicians and two patient groups			
24	42	(https://www.cadth.ca/sites/default/files/pcodr/pcodr_venetoclax_venclexta_cll_fn_rec.pdf).			
24 24 24	43 44 45	Table 4: Clinician response to preliminary recommendation from panCanadian         Oncology Drug Review			
_	-	Preliminary recommendation from panCanadian Oncology Drug Review			

		Fund	Fund with conditions or criteria	Do not fund
<b>Response from</b>	Agrees	1	17	1
clinicians	Agrees in part	0	7	2
	Disagrees	0	0	9

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p < 0.0001, Fisher exact test

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248 There were 40 clinicians who provided comments on 13 preliminary recommendations where

249 it was possible to determine their FCOI. (Comments on the other 24 preliminary

250 recommendations were made by a group of clinicians and names of individuals were not

251 provided.) When the recommendation was fund or fund with conditions or criteria the

252 majority of clinicians (18 out of 27) had no FCOI whereas when the recommendation was do

253 not fund, the plurality of clinicians (6 out of 13) had a FCOI with the submitting company

254 (Table 5). The distribution of FCOI of clinicians depending on the type of preliminary

255 recommendation was statistically significantly different, p = 0.027 (Fisher exact test).

#### 256 Table 5: Association between conflict of clinicians and preliminary funding

#### 257 recommendation

		Fund/Fund with conditions or criteria		
Agree/Agree in part	4	5	18	
		Do not	fund	
Disagree	6	4	3	
p = 0.027, Fisher exa	ict test	12:		
Discussion				

#### 262 Discussion

263 The results of this study show that two-thirds of the clinicians who make submissions to the 264 pCODR have FCOI with one or more pharmaceutical companies and almost half have FCOI 265 with the company making the product that is being considered for public funding. The 266 amount of money that clinicians received for their activities on behalf of the companies is not 267 known as that information is blacked out on their FCOI declaration forms. In over 70% of the 268 drug-indications being reviewed by the pCODR the majority of clinicians making 269 submissions had conflicts. The largest number of activities for which physicians were paid 270 was serving in an "advisory role", but exactly what this means is not clarified in the FCOI 271 documents that are made public and it is possible that this term was interpreted differently by individual clinicians. 272

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5	274	The level of COI revealed in this study is greater than that reported in a 2015 survey of
7 8 0	275	Canadian physicians, where 46% said that they had been retained by a pharmaceutical
9 10 11	276	company in some capacity at some point in their career (7). It is also substantially larger than
12 13	277	the level of FCOI of people serving on FDA advisory committees. These are committees
14 15 16	278	convened by the FDA to vote on whether the FDA should approve new drug applications. An
16 17 18	279	analysis of 379 meetings held over 15 years by 15 committees found that the median level of
19 20	280	meeting "conflictedness" (percentage of individuals with a reported FCOI) was around 13%
21 22	281	(range 2% to 29%). On average, committees reported that half of their meetings were
23 24 25	282	attended by at least 1 person with a financial conflict (6).
25 26 27	283	
28 29	284	An additional issue that this study identified was that there is missing information in a
30 31 32	285	substantial number of FCOI declarations. Statements about stock ownership were not
33 34	286	completed 11.9% of the time and those about a personal or commercial relationship were not
35 36	287	completed 12.6% of the time. These omissions raise the question about whether these
37 38 30	288	declarations are just pro forma, i.e., a piece of paper to be filled out and then ignored by the
39 40 41	289	pCODR. Moreover, there is evidence that declarations about FCOI are often omitted in
42 43	290	medical journal articles (8, 9), in clinical practice guidelines (10, 11) and among people
44 45	291	presenting at conferences (12).
46 47 48	292	
49 50	293	Two important questions are whether the conflicts held by the clinicians influenced their
51 52	294	view about the drug-indication being considered and whether the conflicts influenced the
53 54 55	295	final decision by the pCODR. pCODR does not publish the submissions from the clinicians
55 56 57	296	but summarizes them in its reports and does not necessarily attribute views to individual
58 59 60	297	people or individual groups in the case where more than one individual or group makes a

submission. Therefore, when there are submissions from more than one individual clinician or more than one group of clinicians it is generally not possible to link views about a drug-indication (positive, neutral, negative) to the FCOIs. However, 75% of the time when the preliminary recommendation of the pCODR was not to fund the drug clinicians making submissions disagreed with the decision and most of the clinicians who disagreed with the recommendation declared a FCOI with the company making the product. These finding suggest that FCOI did determine clinicians' views about the product. This suggestion needs to be tempered by a couple of points. First, clinicians may have held favourable views about the drug-indication before their relationship with a drug company started. Second, there can be a legitimate argument about whose views of the drug-indication were more accurate, those of the clinicians or those of the pCODR. 

As to whether or not the clinicians had an influence on the final recommendation of the pCODR, it may be relevant that the pCODR only changed its recommendation from do not fund to fund with conditions in one out of the 9 cases where the clinicians disagreed with the preliminary decision. Removing all of the FDA advisory committee members with conflicts would have produced margins less favourable to the drug being considered in the majority of meetings, but this would not have changed whether the majority favoured or opposed the drug (13).

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In Australia, the Pharmaceutical Benefits Advisory Committee (PBAC) serves somewhat the
same role as the pCODR (14). In making submissions to the PBAC, companies are able to
recruit experts to provide an opinion about their drug and the sponsors have to provide a
signed statement from each expert about their FCOIs (15). However, the FCOI documents

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from these experts are not publicly available so their degree of FCOI cannot be compared tothat of experts giving input to pCODR.

The literature about whether disclosure of FCOI affects trust in individual doctors, the pharmaceutical industry and the healthcare system in general is mixed. A systematic review about the impact of disclosing financial ties in research and clinical care, found that patients believe that these influenced professional behaviour, decreased the quality of research evidence and should be disclosed (16). More recently, one study reported that when patients believed that a gift relationship existed, they had lower levels of physician trust and higher rates of health care system distrust (17). While the level of payments affected perceptions of honesty and fidelity in individual physicians, viewing an online disclosure database did not affect patients' trust ratings for the medical profession or the pharmaceutical industry (18). Patient attitudes about FCOI in cancer research seems to be more forgiving. Most patients in cancer-research trials were not worried about FCOI between researchers and drug companies and would still have enrolled in the trial if they had known about these relationships (19). The only Canadian study on patients' attitudes found that public opinions on physician-pharmaceutical industry interactions differ depending on the scenario but suggested a significant level of concern regarding interactions involving direct financial benefit to physicians (20). Whether the conflicts held by clinicians leads to a public perception that the pCODR process is biased is a question that this current study cannot answer but should be the subject of further research. 

344 Limitations

345 These results about the presence of conflicts only apply to clinicians making voluntary,

346 unsolicited submissions about funding oncology drugs and the distribution of conflicts among

> other clinicians treating cancer who did not make a submission may be different. Similarly, the results may not apply to clinicians treating other diseases. Clinicians did not comment on 9 out of 46 preliminary recommendations. Whether they agreed with the final recommendation from pCODR is not known although it seems unlikely that they would have changed their views between the preliminary and final recommendations. FCOI declarations were not independently checked to see if there were undisclosed FCOI. The main strength of this study is that it looked at the entire population of recommendations from pCODR where clinicians made a submission about the drug-indication being considered.

## 356 Conclusion

Conflicts with pharmaceutical companies are widespread among experts making submissions to the pCODR. Information about how much experts are reimbursed for the activities that they undertake on behalf of companies is not disclosed by pCODR and attributing views to individual clinicians or groups of clinicians cannot be done since only summaries of the submissions are published. pCODR should publish full submissions, the exact amounts that clinicians receive and the names of companies making each of the payments, in order to help determine any association between payments and clinicians' views. pCODR could also consider specifically asking clinicians without any FCOI to make submissions.

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## Supplementary File 1: Number (percent) of clinicians with drug company conflicts per drug-indication

Generic name*	Number of clinicians making submission	Number (percent) of clinicians with conflict with any company	Number (percent) of clinicians with conflict with company making drug	
alecensaro	10	7 (70)	4 (40)	
alectinib	4	4 (100)		
alectinib	8	7 (87.5)	2 (25)	
apalutamide	10	9 (90)	8 (80)	
atezolizumab	8	6 (75)	1 (12.5)	
avelumab	5	5 (100)	1 (20)	
blinatumomab	2	1 (50)	1 (50)	
blinatumomab	14	1 (100)	1 (100)	
brentuximab vedotin	5	2 (40)	1 (20)	
cabozantinib	3	2 (66.7)		
carfilzomib	4	3 (75)	2 (50)	
ceritinib	3	3 (100)	3 (100)	
dabrafenib & trametinib	9	7 (77.8)	4 (44.4)†	
daratumumab	8	7 (87.5)	6 (75)†	
daratumumab	9	9 (100)	8 (88.9)	
fulvestrant	4	1 (25)	0(0)	
ibrutinib	1	1 (100)	1 (100)	
inotuzumab	5	2 (40)	2 (40)	
ozogamicin				
irinotecan liposome	6	4 (66.7)	2 (33.3)	
ixazomib	6	5 (83.3)*	5 (83.3)*	
lenvatinib	5	5 (100)	4 (80)	
lenvatinib	7	6 (85.7)	5 (71.4)	
midostaurin	4	1 (25)	1 (25)	
nivolumab	4	1 (25)	0 (0)	
nivolumab	3	1 (33.3)	0 (0)	
nivolumab & ipilimumab	5	5 (100)	5 (100)	
nivolumab & ipilimumab	4	3 (75)	2 (50)	
obinutuzumab	3	2 (66.7)	2 (66.7)	
olaparib	7	6 (85.7)	5 (71.4)	
olaparib	10	6 (60)	5 (50)	
olaratumab	1	0 (0)	0 (0)	
osimertinib	5	5 (100)	4 (80)	
osimertinib	9	7 (77.8)	7 (77.8)	
palbociclib	2	1 (50)	1 (50)	
panitumumab	16	8 (50)†	6 (37.5)‡	
pembrolizumab	7	6 (85.7)	3 (42.9)	
pembrolizumab	6	4 (66.7)‡	2 (33.3)‡	

pembrolizumab	10	4 (40)	3 (30)
pembrolizumab	4	2 (50)	1 (25)
pertuzumab-	4	1 (25)	1 (25)
trastuzumab Combo			
Pack			
regorafenib	7	3 (42.9)†	0 (0)‡
ribociclib	2	0 (0)	0 (0)
rituximab	1	0 (0)	0 (0)
trifluridine &	12	3 (25)¶	2 (16.7)¶
tipiracil			
vandetanib	1	1 (100)	1 (100)
venetoclax	11	8 (72.7)	7 (63.6)

\*Some drugs were submitted for different indications or were submitted more than once for the same indication if they were initially refused funding.

<sup>†</sup>Information about conflicts missing for one clinician.

‡Information about conflicts missing for two clinicians.

¶ Information about conflicts missing for three clinicians.

Name of company	Number of times mentioned
AbbVie	8
Amgen	20
Astellas	8
AstraZeneca	53
Away BioPharma	1
Bayer	6
Boehringer Ingelheim	44
Bristol-Myers Squibb	48
Canadian L	1
Celgene	17
Eisai	10
Eli Lilly	21
EMD Serono	3
ESMO	2
Ferring	2
Genomic H	1
Gilead	3
GlaxoSmithKline	3
Hoffman-LaRoche	34
Immunocore	2
Immunovaccine	1
Ipsen	4
Janssen	34
Johnson & Johnson	4
Karyopharm	1
Lundbeck	4
Merck	57
Merrimack	1
Millenium	2
Novartis	52
Otsuka	1
Pfizer	27
Sanofi Genzyme	8
Seattle Genetics	2
Shire	2
Taiho	2
Takeda	11
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### Supplementary File 2: Number of times conflict with company mentioned

STROBE Statement—checklist of items that should be included in reports of observational studies

	Item No	Recommendation	Page No
Title and abstract	1	(a) Indicate the study's design with a commonly used term in the title or	1
		the abstract	
		(b) Provide in the abstract an informative and balanced summary of what	3-4
		was done and what was found	
Introduction			
Background/rationale	2	Explain the scientific background and rationale for the investigation being reported	7
Objectives	3	State specific objectives, including any prespecified hypotheses	8
Methods			
Study design	4	Present key elements of study design early in the paper	8
Setting	5	Describe the setting locations and relevant dates including periods of	8-9
betting	5	recruitment exposure follow-up and data collection	
Particinants	6	(a) Cohort study—Give the eligibility criteria, and the sources and	
1 articipants	0	methods of selection of participants. Describe methods of follow-up	
		Case-control study—Give the eligibility criteria, and the sources and	
		methods of case ascertainment and control selection. Give the rationale	
		for the choice of cases and controls	
		Cross-sectional study – Give the eligibility criteria, and the sources and	
		methods of selection of participants	
		(b) Cohort study. For matched studies, give matching criteria and	
		(b) Conort study—1 of matched studies, give matching effectia and	
		Case control study — For matched studies, give matching criteria and the	
		number of controls per case	
Variables	7	Clearly define all outcomes exposures predictors potential confounders	67
vallables	/	and effect modifiers. Give diagnostic criteria, if applicable	0-7
Data sources/	8*	For each variable of interest, give sources of data and details of methods	5-6
measurement	0	of assessment (measurement). Describe comparability of assessment	5-0
measurement		methods if there is more than one group	
Bias	9	Describe any efforts to address potential sources of bias	
Study size	10	Explain how the study size was arrived at	
Ouantitative variables	10	Explain how the study size was arrived at	80
Qualititative variables	11	applicable, describe which groupings were chosen and why	0-9
Statistical matheda	12	(a) Describe all statistical methods, including these used to control for	10
Statistical methods	12	(a) Describe all statistical methods, including those used to control for	10
		(h) Describe any methods used to exemine subgroups and interactions	
		(b) Describe any methods used to examine subgroups and interactions	
		(c) Explain now missing data were addressed	
		(a) <i>Conort stuay</i> —II applicable, explain now loss to follow-up was	
		<i>Case-control stuay</i> —II applicable, explain now matching of cases and	
		controls was addressed	
		<i>Cross-sectional study</i> —If applicable, describe analytical methods taking	
		account of sampling strategy	
		( <u>e</u> ) Describe any sensitivity analyses	

Continued on next page

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<ul> <li>(a) Report numbers of marviauus at each stage of study beginnineers potenticligible, examined for eligibility, confirmed eligible, included in the study, completing follow-up, and analysed</li> <li>(b) Give reasons for non-participation at each stage</li> <li>(c) Consider use of a flow diagram</li> <li>(a) Give characteristics of study participants (eg demographic, clinical, social information on exposures and potential confounders</li> <li>(b) Indicate number of participants with missing data for each variable of interval</li> <li>(c) <i>Cohort study</i>—Summarise follow-up time (eg, average and total amount)</li> <li><i>Cohort study</i>—Report numbers of outcome events or summary measures over <i>Case-control study</i>—Report numbers in each exposure category, or summary measures of exposure</li> <li>(a) Give unadjusted estimates and, if applicable, confounder-adjusted estimate their precision (eg, 95% confidence interval). Make clear which confounders adjusted for and why they were included</li> </ul>
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(b) Report category boundaries when continuous variables were categorized
(c) If relevant, consider translating estimates of relative risk into absolute ris
meaningful time period
Report other analyses done-eg analyses of subgroups and interactions, and
sensitivity analyses
Summarise key results with reference to study objectives
Discuss limitations of the study, taking into account sources of potential bias
imprecision. Discuss both direction and magnitude of any potential bias
Give a cautious overall interpretation of results considering objectives, limit
multiplicity of analyses, results from similar studies, and other relevant evid
Discuss the generalisability (external validity) of the study results
Give the source of funding and the role of the funders for the present study a
applicable, for the original study on which the present article is based
ately for cases and controls in case-control studies and, if applicable, for expos
ort and cross-sectional studies.
nd Elaboration article discusses each checklist item and gives methodological
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scriptive 14*		(a) Give characteristics of study participants (eg demographic, clinical, social) and	
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		(b) Indicate number of participants with missing data for each variable of interest	
		(c) Cohort study—Summarise follow-up time (eg, average and total amount)	
tcome data 15*		Cohort study-Report numbers of outcome events or summary measures over time	
		<i>Case-control study</i> —Report numbers in each exposure category, or summary	
		Cross sectional study. Benert numbers of outcome events or summery measures	
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y results	18	Summarise key results with reference to study objectives	14
nitations	19	Discuss limitations of the study, taking into account sources of potential bias or	17-
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erpretation	20	Give a cautious overall interpretation of results considering objectives, limitations,	15-
		multiplicity of analyses, results from similar studies, and other relevant evidence	17
neralisability	21	Discuss the generalisability (external validity) of the study results	17-
			18
her informati	on		

e the source of funding and the role of the funders for the present study and, if licable, for the original study on which the present article is based

boration article discusses each checklist item and gives methodological background and rent reporting. The STROBE checklist is best used in conjunction with this article (freely LoS Medicine at http://www.plosmedicine.org/, Annals of Internal Medicine at http://www.annals.org/, and Epidemiology at http://www.epidem.com/). Information on the STROBE Initiative is available at www.strobe-statement.org.