

Article details: 2019-0010	
Title	Declarations of interest by members of Health Canada's Special Advisory Committees and Panels: a descriptive study
Author	Joel Lexchin MSc MD
Reviewer 1	Jimmy Pham
Institution	Olive View-University of California, Los Angeles (UCLA), Internal Medicine
General comments and author response	<p>Captions for tables are incomplete. The captions/legends need to be descriptive enough that the readers do not need to refer to the texts to understand the tables. Response: The captions of the tables have been checked and expanded where necessary. (Tables 1-4)</p> <p>references need the date of access Response: The date of access has been added to the references. (pages 13-15)</p> <p>please state the significance of this paper Response: The significance of the paper is stated in the first two sentences of the Conclusion: "Biases in voting as a result of interests could influence the quality of the advice that SAC/SAP committee members give and sales of products." (page 11)</p> <p>poorly designed study Response: If the reviewer could elaborate on this comment I would be happy to try and address it.</p>
Reviewer 2	Peter Lurie
Institution	Center for Science in the Public Interest, Washington, DC
General comments and author response	<p>The data on which the authors are reporting appear to be those based on filings typically from the time the member first joined the committee, and therefore may be out of date. Response: The point about the interests not being current has been made in the Limitations subsection. (page 10)</p> <p>There are no meeting-specific declarations available to the authors. As a consequence, one cannot tell if any conflict declared might be with the sponsor of the index drug, a competitor or some third party. Response: This point has been added to the Limitations subsection. (pages 10-11)</p> <p>The paper is probably more suited to a Research Letter or the equivalent, rather than a full research article. Response: I do not believe that CMAJ Open has a Research Letter option and the editors did not suggest reducing the size of the manuscript. Therefore, I have left this as a full research article.</p> <p>There is a fair amount of extraneous material in the Results and Discussion and the essential data could be conveyed more informatively. Response: The material in the Results and Interpretation has been modified based on the later comments of the reviewer. Specifically, the material about the perspectives/sectors of the SAC/SAP members has been retained as it was requested by the CMAJ Open editors: "There should be a Table describing the included individuals, sorted by SAC or SAP."</p> <p>Page 3, Methods: Define period of data collection Response: It is now stated that data collection was done in December 2018. (page 3)</p> <p>Page 3, line 24: Term "indirect" not yet defined (or self-evident) Response: A reference to define the term "indirect" has now been inserted. (page 3, reference 4)</p> <p>Page 3, lines 24-29: Suggest omitting; self-evident Response: I am not sure why the reviewer regards the collection of information about the SAC/SAP meetings as self-evident and I have left this sentence in the Abstract. (page 3)</p> <p>Page 3, line 33: Report number of meetings these 11 committees had.</p>

Response: The number of meetings has been added. (page 3)

Page 3, line 35: Report number of indirect and intellectual conflicts here, too

Response: The number of indirect financial interests and intellectual interests has been added. (page 3)

Page 3, line 54: Add "Due to lack of available data on voting records," to sentence beginning with "It"

Response: The phrase has been added. (page 3)

Page 4, lines 10-20: More useful than quotes describing the SACs/SAPs would be a more user-friendly description. I took it that SACs are more about policy, while SAPs are more technical, but you want to make that distinction clearer. In general, the paper seems under-analyzed with respect to any differences between SACs and SAPs.

Response: the committees and panels made clearer. Since the same general criteria are used to appoint members of committees and panels I believe that the analysis should be based on the total membership of committees and panels. (page 4)

Page 4, line 35: Cite definition of "direct financial interest" or reference Table 1; same for indirect (especially) and intellectual at lines 47-9

Response: A reference (4) has been inserted for the definitions of direct & indirect financial interests and intellectual interests. (page 4)

Pages 4-5: Since you weren't able to assess voting patterns (and this must have been clear very early on in the study), would not list this as an objective, but mention in the Discussion.

Response: I disagree with this suggestion. The objective was still to look at the association between interests and voting pattern. The fact that it was not possible does not disqualify it as an objective. (page 5)

Page 5, line 25: The "types" of conflict have not been defined (and need to be in the text)

Response: The four types of conflicts are now listed. (page 5)

Page 5, line 42: List the four categories followed by a parenthetical reference to Table 1

Add "by an author" after "SAC/SAP" to contextualize the reference to "A second person" in line 49

Response: The four categories have already been listed as per the response immediately above. The phrase "by the author" has been added. (page 5)

Page 5, lines 42-49: No need to list all this information extracted if you don't actually report on it

Response: The "name of chair" and "date of terms of reference" have been deleted. The rest of the information extracted is relevant to the analysis and has been left in. (page 5)

Page 6, line 40: Are old members' data taken down? Were the authors able to identify any members whose data was missing?

Response: This information is already in the manuscript in the Results: "Health Canada does not provide a list of the membership of these inactive committees and panels." (page 7)

Page 6, lines 45-52: The information about inactive panels is not really relevant and could be omitted.

Response: I believe that this information is relevant as it means that the composition of the majority of committees and panels cannot be determined. This lack of data is mentioned in the Limitations subsection. (page 10)

Page 6, lines 52-56: It appears that the data are from enrollment and may not be up to date. This is a limitation that must be acknowledged.

Response: This is now acknowledged in the Limitations subsection. (page 10)

Page 7, line 8: From how many individuals had these 12 conflicts?

Response: It is made clear that there were 12 individuals this this conflict. (page 7)

Page 7, line 8: Would insert "5/11 SAC/SAPs had at least one member with a direct COI." In general, would report results as 1. % of SAC/SAPs with at least one member with COI and 2. the % of all members that have a COI. Those are the two most compelling measures. Whether there is a majority is secondary (and less precise). Would rewrite from here through line 27 accordingly.

Response: The Results section has been rewritten, focusing on the overall number of individuals from the different perspectives/sectors and the distribution of their interests and then on the number with different interests on SACs/SAPs and finally on the recommendations from the SACs/SAPs. Table 2 (previously table 3) shows the distribution of individuals from different perspectives/sectors and the distribution of their interests. (page 7)

Page 7, line 10: Given small numbers would not report COI %s (much less with a significant digit); just n's.

Response: Only numbers are now reported. (page 7)

Page 7, lines 33-40: Why is this the only section broken down by SAC/SAP? Much more interesting would be that breakdown for the COIs. This is a significant omission.

Response: The data has been reanalyzed as recommended by the reviewer and table 3 (now table 2 – see above) has been changed to reflect this new analysis. (page 7 & Table 2)

Page 7, line 38: Re-word sentence beginning with "Declarations" as follows: "Twenty-six out of 46 members listed academia alone or academia with an additional sector, and 10 listed health professional."

Response: The data has been reanalyzed as recommended by the reviewer and this sentence has been deleted. (page 7)

Page 7, lines 56-59: This content is repetitive and already stated in Methods

Response: This material has been deleted.

Page 8, lines 3-8: Belongs in Methods

Response: This material is not discussed in the Interpretation and has been deleted.

Page 8, line 12: Over what time period is this? This material should appear earlier in the Results.

Response: The dates have been added. (page 8)

Page 8, lines 24-26: Replace "not recorded" with "not publicly disclosed."

Response: This sentence has now been deleted.

Page 9, lines 1-20: Most of this has already been stated.

Response: This section has been significantly shortened. (pages 8-9)

Page 9, lines 24-26: I'm not sure I agree that Health Canada is implicitly equating the importance of financial and intellectual interests. I think it would be more accurate to state "Health Canada seems to be suggesting the substantial importance of both types". The material that follows on this point (lines 24-60) seems disproportionate. One thing omitted from that discussion, though, is that financial COIs are quantifiable and so easier to police than intellectual conflicts.

Response: The wording of the initial sentence has been changed in line with the reviewer's suggestion. The rest of the material on lines 24-60 has been substantially reduced but I have added a point about financial interests being easier to document and regulate. (page 9)

Page 9, lines 54-59: This statement may not be accurate if taking into account financial interests related to competitors

Response: This material has been deleted.

Page 10, line 17: Substitute “votes” for “pro-sponsor bias.”

Response: “Bias” has been replaced by “votes”. (page 9)

Page 10, lines 21-59: Consider whether this paragraph belongs in the introduction. If the article is shortened, much of this can be omitted.

Response: The material in this paragraph was added in response to the editors request: “What are the standards for declarations? What is done in other countries and how does this compare with what is done in Canada? What is done in other agencies in Canada (such as CADTH) and how does this compare?” (pages 9-10)

Page 10, line 31: The number of FDA waivers has not been increasing (and is in fact very low); this is a very old reference. See instead here:

<https://www.fda.gov/downloads/AdvisoryCommittees/AboutAdvisoryCommittees/UCM545110.pdf>

Response: The sentence about the number of waivers increasing has been deleted.

Page 10, line 33: Most importantly, the data detailed in the U.S. are available for each meeting, not simply at enrollment (and thus, effectively, merely for each committee).

Response: This point has been added. (page 10)

Page 11, line 15: You have done a study of active committees, and I don’t think the omission of inactive ones, particularly if they have been inactive for years, is really a limitation.

Response: I think that it is important to point out that data on all of the previous committees and panels cannot be analyzed and have left this section in.

Page 11, lines 10-26: Additional limitation is lack of sufficient data to perform statistical analyses beyond descriptive ones

Response: This point is made in the Conclusion. (page 12)

Page 11, lines 30-40: Not really a limitation. You can just say in the methods that you have done this and why.

Response: The CMAJ editors asked why the data about indirect financial and intellectual interests were combined and this sentence in the Limitations subsection is part of the rationale for that decision: “No rationale was given for combining the three types of indirect financial interests into one category. Similarly, for the intellectual interests.” (page 11)

Page 12, line 1: I do not believe the IOM committee said anything about AC COI.

Response: I have now made the point that the IOM recommendations were about guideline panels. (page 11)

Page 12, lines 40-45: Does Health Canada not produce a transcript from which these voting data could be abstracted? That’s the real problem.

Response: In the Methods section the point is now made that transcripts are not available. At the end of the Conclusion I make the point that transcripts and voting patterns should be made available. (pages 5 & 12)

Table 2: Rename table “Number (percent) of SAC/SAP members declaring Rename table “Number (percent) of SAC/SAP members declaring various types of interest”

Add row for Total numbers of the different types of declarations of interest

Response: The table (now table 3) has been renamed. The additional row has been added. (Table 3)

Table 3: I’m not sure this table is necessary—the information could be described in 1-2 sentences in the text instead, and this level of detail does not seem to support any particular objective of the paper. Data on sector/perspective of SAC/SAP members could be correlated with likelihood of declaration of interest, but this was not done.

Response: In line with the reviewer's earlier comment about reanalyzing the data with respect to interests and perspectives/sector this table (now table 2) has been changed to reflect this analysis and the information is discussed in the Results and briefly in the Interpretation. (Table 2)

Table 4: Page 8 Line 12 states "The 11 SACs/SAPs had a total of 30 meetings" but the total of the "Number of meetings" column in this table is only equal to 24. Would omit table as not related to COI question.

Response: A number of committees/panels were inadvertently left out of the table. The correct number of total meetings is 30. In line with the request of the editors the table has been retained. (Table 4)