

Conflict of Interest scenarios

Introduction

The following scenarios are based on Conflict of Interest (CoI) cases and questions received by <a href="tel:the-new-the-new-the-new-the-new-the-new-the-new-th-ne-

- 1 Funding or conduct by commercial organizations
- 2 Employment
- 3 Other financial support from commercial organizations or sources
- 4 Patents
- 5 Investigators on clinical studies included in Cochrane Reviews
- 6 Funding by not-for-profit organizations

Basic principles

All the examples shown below should be considered in the context of the following basic principles outlined in the <u>Conflict of Interest Policy for Cochrane</u> Library Content (2020):

1. A **commercial organization with a financial interest** is defined as any for-profit organization with a real or potential financial interest in the findings of Cochrane Library content. This definition is not intended to include government departments, not-for-profit medical insurance companies, health management or health research organizations, or independent patient advocacy groups.



- 2. Financial interests are considered to be **relevant** if the payment comes from a commercial organization that has developed (or is known to be developing), or distributed (anywhere in the world), an intervention or potential comparator. This applies even if the payment was made for work or advice that did not relate specifically to the topic of the Cochrane Library content.
- 3. A **funder** is defined as any organization which provides a grant, contract, or any form of financial support to one, several, or all authors, or funding that goes directly to their employer, or home institution, or to the Cochrane Review Group, specifically for the purposes of undertaking a Cochrane Review
- 4. An **industry-controlled study** is defined as one in which funding was provided by a commercial organization. The study design and methods are wholly or in part determined by the organization and study design, methods, data analysis and reporting are controlled by the organization.
- 5. An **industry-supported clinical study** is defined as one in which a commercial organization provides some or all funding or material, non-financial support (e.g., placebo or active drugs, diagnostic or other test access) to the study, but independent researchers retain complete control over the study design, methods, data analysis and reporting.
- 6. **Financial interests (other than direct employment)** include, but are not limited to, payments for speaker fees, honoraria, consultancies, and membership of advisory boards; support for sabbaticals and study tours; payment of travel, accommodation, subsistence and conference registration expenses; ownership of stock/shares in healthcare-related companies with a financial interest, payment for legal advice related to the topic of specific Cochrane Library content, royalties relevant to the topic of the Cochrane Library content, funding for research in the subject area of the topic of specific Cochrane Library content, support for fellowships and other professional placements.
- 7. The **first and last authors** of a Cochrane Review and **two-thirds of the review team** overall must have no relevant COIs.
- 8. The **first author** is the first named author in the review by-line.
- 9. Financial and non-financial interests are considered to be relevant if they existed in the period beginning **36 months** prior to submission of the protocol, review, or update manuscript and ending at publication, including interests acquired during the development of the protocol/review/update.



1 Funding or conduct by commercial organizations

No.	Scenario	Multiple choice responses	Answer	Policy Section
1.	The original review was supported by a commercial organization with a financial interest in the topic of the review but was subsequently updated without any further support from commercial sources. Does the updated review comply with the policy?	 Yes No Unclear 	Answer 1. This complies with the policy. If the support was not ongoing when the update was conducted it complies with the policy.	Section <u>5.1</u>
2.	The review is funded by a charity that has close ties to the pharmaceutical industry. Does this comply with the policy?	 No, a charity funded by pharma could be considered just as problematic as a pharma company itself. Yes, funding by not-for-profit organizations is acceptable. It's unclear and should be referred to the Research Integrity Editors. 	Answer 3. This should be referred to the Research Integrity Editors with full details of the relationship between the charity and the industry/individual commercial organizations that fund it. A charity that receives all or most of its funding from a commercial organization with an interest in the outcome of the review may not be considered a 'not-for-profit' organization.	Section <u>5.1</u> + Definitions
3.	One source of support listed is from a commercial organization but not one with an obvious interest in the intervention being considered. Does this comply with the policy?	 Yes No It's unclear and should be referred to the Research Integrity Editors. 	Answer 3. This should be referred to the Research Integrity Editors and the author(s) must justify why the source of support does not represent a conflict.	Section <u>5.1</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
4.	A commercial organization approaches a Cochrane Review Group to produce a review that will inform the development of one of their products. Does this comply with the policy?	 Yes, it complies because their product is not currently available on the market. No, the commercial organization has a potential financial interest in the topic. 	Answer 2. This does not comply with the policy. Cochrane Library content cannot be directly funded by a commercial organization with a financial interest in the topic. Even if the product has not yet been developed, the company still has a financial interest in the outcome of the review because they might manufacture the product in the future.	Definitions
5.	A person involved in authoring a Cochrane Review receives a grant from a commercial organization that produces the intervention being considered. The grant includes funding to write the review. Does this comply with the policy?	 Yes No It's unclear and should be referred to the Research Integrity Editors. 	Answer 2. This does not comply with the policy. Cochrane Reviews cannot be directly funded by a commercial organization with a financial interest in the topic (i.e. the commercial organization manufactures (or is known to be developing), or distributes (anywhere in the world), an intervention or potential comparator). This includes funding of an author to write the review.	Section <u>5.1</u>
6.	The review is funded by a commercial organization that distributes a competing intervention that is not included in the review. Does this comply with the policy?	 Yes, it complies because the funder's product is not included in the studies of the review. No, Cochrane Library content cannot be funded 	Answer 2. This does not comply with the policy. A commercial organization that manufactures (or is known to be developing), or distributes (anywhere in the world) a competing intervention (included or not included in the review) cannot fund the review.	Section <u>5.1</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
		by a commercial organization with a financial interest in the topic.		

2 Employment

No.	Scenario	Μι	ultiple choice responses	Answer	Policy Section
1.	An author on a Cochrane Review is employed by a commercial organization. The commercial organization does not produce, market or distribute the intervention covered in the review nor any competing intervention. Does this comply with the policy?		Yes, this is fine as the commercial organization does not have an interest in the outcome of the review. No, authors of Cochrane Library content cannot be employed by a commercial organization.	Answer 1. This complies with the policy. Employment by a commercial organization is only a problem if that organization has an interest in the outcome of the review (i.e. it manufactures (or is known to be developing), or distributes (anywhere in the world), the product under investigation or a potential comparator).	Section <u>5.2</u>
2.	A person involved in creating Cochrane Library content was employed by a commercial organization in the 36 months prior to the manuscript being submitted. The commercial organization does not produce, market or distribute the intervention	1.	Yes, this complies with the policy as the commercial organization does not produce, market or	Answer 2. This does not comply with the policy. The Cochrane Col Policy defines an interest as relevant if relates to an intervention or potential comparator.	Sections Definitions, 5.2 and 5.5



No.	Scenario	Multiple choice responses	Answer	Policy Section
	covered in the review but does produce, market or distribute a potential competing intervention. Does this comply with the policy?	distribute the intervention covered in the review. 2. No, the commercial organization has an interest in the topic of the review.		
3.	The first author on a Cochrane Review goes to work for a commercial organization that produces the intervention under investigation during the preparation of the review. Does this comply with the policy?	 Yes, this is fine so long as they were free of conflicts when they started work on the review. No, employment by a commercial organization with a financial interest in the outcome of the review is prohibited. It depends on the stage that the author went to work for the commercial organization. 	Answer 2. This doesn't comply with the policy. Employment by a commercial organization with a financial interest in the topic of the review is prohibited (regardless of position in the author list) in the period beginning 36 months prior to article submission through to the date of publication. If this is disputed it should be referred to the Research Integrity Editors.	Sections <u>5.2</u> and <u>5.5</u>
4.	An author goes to work for a relevant commercial organization after the review is published. Does this comply with the policy?	1. Yes 2. No	Answer 1. The current version of the review would comply with the policy as the author did not have a CoI at any point from 36 months before article submission through to the date of publication. The author cannot participate in the next update if they are	Sections <u>5.2</u> and <u>5.5</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
			still working for a relevant commercial organization at that point (or have done in the 36 months prior to update submission).	
5.	A person involved in writing a Cochrane Review is employed by an organization that conducts clinical trials, some of which are funded by a commercial organization with an interest in the intervention under investigation. Does this comply with the policy?	 Yes No It's unclear - more information is needed 	Answer 3. More information is needed to determine whether this complies with the policy. It should be referred to Research Integrity Editors. It is important to clarify whether any of these trials are eligible for inclusion in the review and how much control the commercial organization had over the conduct of the studies.	Sections <u>5.2</u> and <u>5.5</u>
6.	A person involved in writing a Cochrane Review was paid through a commercially-funded clinical fellowship while the review was being written. There is no mention of what restriction applied to the fellowship. Does this comply with the policy?	 Yes No It's unclear – more information is needed. 	Answer 3. More information is needed to determine whether this complies with the policy. In many cases this will be compliant but further information should be sought about what (if any) restrictions applied to the fellowship and if the granting process was competitive and independently adjudicated. This should be referred to Research Integrity Editors.	Sections <u>5.2</u> and <u>5.5</u>
7.	An author team wishes to add a new author to a Cochrane Review. The new author is employed by a large pharmaceutical company which manufactures	Yes, as long as the author does not work in a part of the company that is	Answer 2. This does not comply with the policy. The arm or section of the company in which the proposed new	Section <u>5.2</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
	the drug, but the person works in a different section of the company; i.e. one that has no role in manufacturing the drug of interest. Does this comply with the policy?	directly involved in manufacturing the drug there's no conflict of interest. 2. No, there is a conflict of interest regardless of which the section of the company the person works in.	author is employed is not relevant. The company as a whole has a financial interest in the outcome of the review. If this is disputed, refer to the Research Integrity Editors.	
8.	An author on a review of a specific class of drugs for a subtype of cancer is employed by pharmaceutical company which manufactures a drug of that class. That drug is currently only licensed for use in another subtype of the same cancer and so would not be included in the review. Does this comply with the policy?	 Yes, this would only be a Col if the drug is used in the specific subtype of the cancer covered in the review. No, this is a Col as the company still has a financial interest in the outcome of the review. 	Answer 2. This does not comply with the policy. The company still has a financial interest in the outcome of the review because they might market their drug for this indication in the future. If this is disputed, refer to Research Integrity Editors.	Section <u>5.2</u>
9.	A person involved in creating Cochrane Library content receives a stipend for an internship at a commercial organization that distributes the intervention being reviewed. Does this comply with the policy?	1. Yes 2. No	Answer 2. This does not comply with the policy. A paid internship is equivalent to employment. An individual employed by a company that has a financial interest in the outcome of the review cannot be an author on the review.	Section <u>5.2</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
10.	A person involved in creating Cochrane Library content owns a commercial organization that distributes the intervention or a potential competing intervention but their primary affiliation is a University. Does this comply with the policy?	 Yes, it is only the authors primary affiliation that is important. No, ownership of a commercial organization with an interest in the topic is a Col. It is unclear – more information is needed. 	Answer 2. This does not comply with the policy. The ownership of a commercial organization with a financial interest in the topic of specific Cochrane Library content is classed as a form of employment.	Section <u>5.2</u>

3 Other financial support from commercial organizations or sources

No.	Scenario	Multiple choice responses	Answer	Policy Section
1.	Two authors on a Cochrane Review receive financial support (e.g. consultancy, fees, fellowships, support for sabbaticals, travel bursary, etc.) from a commercial organization that has an interest in the topic of the review. Does this comply with the policy?	 No, the two authors must be removed if the review hasn't already started. Yes, the two authors can stay on the review because these are minor financial interests, not relating to direct employment. It depends on their position in the author line- 	Answer 3. It depends on a number of factors. An author with this type of conflict cannot be first or last author. If neither person is first or last author and 67% (two-thirds) or more of authors are non-conflicted, the review can proceed. If 67% (two-thirds) or more of the authors have a conflict, the review cannot proceed. If disputed, this should be referred to the Research Integrity Editors.	Section <u>5.2</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
		up and the number of authors in the team overall.		
2.	Research grants are paid by a relevant commercial organization to an author's institution. Does this comply with the policy?	 Yes, as the payments are to the institution rather than the author personally. No, payments to an author's institution are considered a Col. It's unclear – more information is needed. 	Answer 3. More information is needed to determine whether this complies with the policy. If an author does not have access to or control over the funds this does not count as a conflict.	Section <u>5.3</u>
3.	An author is recipient of a fellowship that is partially funded by a relevant commercial organization. Does this comply with the policy?	 Yes No It's unclear – more information is needed. 	Answer 3. More information is needed to determine whether this complies with the policy. In many cases this will be compliant but further information should be sought about what (if any) restrictions applied to the fellowship/studentship and if the granting process was competitive and independently adjudicated. This should be referred to the Research Integrity Editors.	Section <u>5.2</u>
4.	One of five authors on a Cochrane Review acted as a paid consultant for a relevant commercial	1. Yes 2. No	Answer 1. This complies with the policy. If only one out of the five authors has	Sections <u>5.2</u> and <u>5.5</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
	organization. They are not the first or last author on the review, and the other authors have declared no relevant interests. Does this comply with the policy?	3. It's unclear – more information is needed.	received financial support then 80% of the team is free from relevant conflicts. This is greater than the 67% (two-thirds) proportion required to comply with the policy.	
5.	The last author on a Cochrane Review is reimbursed for travel expenses and receives the payment directly from a relevant commercial organization. Does this comply with the policy?	 Yes, travel expenses are minor so are not considered a Col. No, the first and last authors cannot receive any direct financial support from a relevant commercial organization, regardless of the activity. It depends on the purpose of the travel. It may be acceptable if the travel relates to an event that had nothing to do with the topic of the review. 	Answer 2. This does not comply with the policy. The last author, like the first author, cannot receive any direct financial support from a relevant commercial organization. The reason for the travel is not taken into consideration, only the fact that the support was received from a commercial organization with an interest in the review topic.	Section <u>5.2</u>
6.	The first author declares payments from organizations with financial interests in the topic of the review but states that the companies did not have any involvement in creating the review. Does this comply with the policy?	1. Yes, if the companies were not actively involved in any aspect of creating the review there is not breach of the policy.	Answer 2. This does not comply with the policy. Payments from organizations with a financial interest in the topic area of the review count as financial conflicts of interest, regardless of whether the	Section <u>5.2</u>



No.	Scenario	Multiple choice responses Answer	Policy Section
		 2. No, even if the company was not actively involved in creating the review it has interest in the outcome and therefore such payments are in breach of the policy. 3. It's unclear, more information is needed. 	
7.	The first author on a Cochrane review received a small one-off payment from a commercial organization with a financial interest in the topic of the review. Does this comply with the policy?	 Yes, as the payment was small and one off. No, any payment from a commercial organization with a financial interest in the outcome is considered a Col. It depends on the exact amount of money received. Answer 2. This does not comply with the policy. The Col Policy for Cochrane Library Content (2020) does not have thresholds for financial interests. A first (or last) author, cannot receive any payments, no matter how small, from a relevant commercial organization.	Section <u>5.2</u>
8.	An author declares payments from a commercial organization with a financial interest in the topic of the review but states that the payment was for work that was not related to the topic of review. Does this comply with the policy?	 Yes, if the payment was for work that was unrelated to the topic of the review there is no conflict. No, it does not matter what the payment was for. Answer 2. This does not comply with the policy. The reason for the payment is not taken into consideration when deciding if a conflict exists. The primary consideration is whether it was received from a company with a financial interest	Section <u>5.2</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
		As it was received from a company with an interest in the topic of the review there is a conflict.	in the topic of the review. If it was, this counts as a conflict.	
9.	The first author on a Cochrane Review sold the stocks they had in a commercial organization with a financial interest in the topic of the review six months before work on the review started. Does this comply with the policy?	 Yes, the author no longer owns the stocks so there is no conflict. No, the first author owned the stocks within the 36 months. 	Answer 2. This does not comply with the policy. The first and last authors and at least two-thirds of the whole author team must be free of relevant financial conflicts of interest from 36 months before article submission, through to when the article is published.	Sections <u>5.2</u> and <u>5.5</u>
10.	A payment is made by a commercial organization to the institution that employs an author on a Cochrane Review. The commercial organization has a financial interest in the topic of the review. Does this comply with the policy?	 Yes, as the commercial organization has financial interest in the topic of the review. No, as the payment is to the institution rather than the author. It's unclear – more information is needed. 	Answer 3. More information is needed to determine whether this complies with the policy. If the author has no access to or control of the funds, this should be declared and does not constitute a conflict of interest. If there is any uncertainty, this should be referred to the Research Integrity Editors.	Section <u>5.3</u>
11.	The first author on a Cochrane Review previously acted as a paid consultant for a commercial organization with a financial interest in the topic of the review. This finished four years ago. Does this comply with the policy?	 Yes, as this ended four years ago. No, this is still relevant as they are the first author. 	Answer 1. This complies with the policy. Authors of Cochrane Reviews should declare relevant financial and nonfinancial interests that existed in the period beginning 36 months before article submission, as well as any that arise between submission and article publication.	Sections <u>5.2</u> and <u>5.5</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
			This is outside of that timeframe so is no longer relevant.	
12.	The last author on a Cochrane Review received a payment from a commercial organization that has a financial interest in the Cochrane Review Group's scope, but not in the topic of the particular review. Does this comply with the policy?	1. Yes 2. No	Answer 1. This complies with the policy. For a financial interest to be relevant a commercial organization must have an interest in the topic of the review. This means that the commercial organization has to manufacture (or be known to be developing), or distribute (anywhere in the world), an intervention or potential comparator) for them to have a relevant financial interest. If there is any uncertainty this should be referred to the Research Integrity Editor.	Section <u>5.2</u>

4 Patents

No.	Scenario	Multiple choice responses	Answer	Policy Section
1.	An author has developed a diagnostic test that is relevant to the topic of the review but does not own the patent or benefit financially from it Does this comply with the policy?	 Yes, it is fine as they do not own it or benefit financially from it. No, their involvement in patenting counts as a Col. 	Answer 1. This complies with the policy. Patents are sometimes held by the author's home institution, rather than held by the author personally. If this is the case and if the author does not	Section <u>5.2</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
			benefit financially from it there is no financial interest.	
2.	An author receives income derived from the ownership of a patented intervention that is relevant to the topic of the review. Does this comply with the policy?	1. Yes 2. No	Answer 2. This does not comply with the policy. The author receives income from the patent therefore a financial interest exists and the review cannot proceed with the conflicted author. If this is disputed, it should be referred to the Research Integrity Editors.	Section <u>5.2</u>
3.	An author owns a patent for a prognostic marker that is relevant to the topic of the review, but it has not generated any income. Does this comply with the policy?	 Yes, as the author hasn't received any payments from it. No, it counts as a conflict of interest. It depends on whether the patent is likely to generate income in the future. 	Answer 3. More information is needed to determine whether this complies with the policy. The author may not yet have received any income but could in the future. This should be referred to the Research Integrity Editors.	Section <u>5.2</u>
4.	An author has licensed a patented intervention that is relevant to the topic of the review to another entity. Does this comply with the policy?	1. Yes 2. No 3. Unclear	Answer 2. This does not comply with the policy. In a license agreement, the patent owner gives another entity (the "licensee") permission to use the patented technology, while the patent owner retains ownership. This means that the author still has a CoI and the review cannot proceed with the conflicted author. If this is disputed, it	Section <u>5.2</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
			should be referred to the Research Integrity Editors.	
5.	An author owns a patent that is related to the Cochrane Review Group's scope but is not related to the review topic. Does this comply with the policy?	 Yes No Unclear 	Answer 1 Yes, this complies with the policy. If the author's patent is not related specifically to the review topic there is no financial conflict of interest.	Section <u>5.2</u>

5 Investigators on clinical studies included in Cochrane Reviews

No.	Scenario	Multiple choice responses	Answer	Policy Section
1.	A Cochrane Review author was a trialist in the majority of studies included in the review, but the studies were not industry-controlled. Does this comply with the policy?	1. Yes, this is fine as the studies were not industry-controlled. 2. No, being an author on any included study is a problem.	Answer 1. This complies with the policy. If the studies were not industry- controlled (i.e. the commercial organization had no role in determining the study design and methods and data analysis and no control over the reporting) this person can be an author (including first or last) on the review. The trial activity must still be declared and there are restrictions to what this person can do in regard to their own study data in the review. If the studies were industry-controlled, they could still be an	Section <u>5.6</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
			author so long as they are not first or last author and 67% of the author group is free from conflicts.	
2.	A Cochrane Review author assisted with recruitment at a trial site, but played no role in gathering or analyzing data, and is not a named author on a published industry-controlled study. Does this comply with the policy?	 Yes No It's unclear – more information is needed. 	Answer 1. This complies with the policy. The policy covers 'direct involvement' in studies, which is defined as being a named author or having other close involvement in the study design, conduct, analysis, or reporting.	Section <u>5.6</u>
3.	The first author on a Cochrane Review was also lead investigator in a study that was controlled by the manufacturer of an intervention being considered in the review. Does this comply with the policy?	1. Yes, involvement in a study does not affect whether someone can be an author 2. No, someone involved in an industry-controlled study cannot be first author on a Cochrane Review that could include that study.	Answer 2. This does not comply with the policy. If the study was industry-controlled this person cannot be first or last author on a Cochrane Review in which the study could be included. They may however take another position in the author line-up (not first or last), provided ≥67% of the team overall are free of financial conflicts. In that case the trial activity must be declared and there are restrictions to what they can do in regard to their own study data in the review.	Section <u>5.6</u>
4.	An author is undertaking a study that would possibly be eligible for inclusion in the review at the time of writing. Does this comply with the policy?	1. Yes 2. No 3. It's unclear – more information is needed.	Answer 3. It's unclear – more information is needed. Whether this complies with the policy depends the author's position in the author line up and whether the	Section <u>5.6</u>



No.	Scenario	Multiple choice responses	Answer	Policy Section
			study is industry-controlled or industry-supported. If the study was industry-controlled the trialist cannot be first or last author on the Cochrane Review. If the study was industry-supported the person can be first or last author. Restrictions to what the person can do in regard to their own study data applies in both cases. If there are any concerns, this should be referred to the Research Integrity Editors.	
5.	The last author on a Cochrane Review was also the lead investigator in a study that received funding from industry. The investigators retained control over all aspects of the study conduct. Does this comply with the policy?	1. Yes, as the study was industry-supported rather than industry-controlled. 2. No, anyone involved in an included study cannot be first or last author on a Cochrane Review. 3. It's unclear – more information is needed.	Answer 1. This complies with the policy. If the study was industry-supported this person can be first or last author on the Cochrane Review in which the trial is relevant. There are however restrictions to what the person can do in regard to their own study data in the review. If the studies were industry-controlled, they could still be an author so long as they are not first or last author and 67% of the author group is free from conflicts.	Section <u>5.6</u>
6.	After the review was published an author receives funding from the manufacturer of the intervention being considered to conduct an investigator-led	1. Yes 2. No	Answer 1. This complies with the policy. Involvement in a new primary study after the review has been published is not prohibited. However, if the subsequent	Section <u>5.6</u>



ſ	No.	Scenario	Multiple choice responses	Answer	Policy Section
		study in that same area. Does this comply with the policy?		study is eligible for inclusion in a future update of the review their involvement in the included study must be declared and there are restrictions to what they can do in regard to their own study data in the review.	

6 Funding by not-for-profit organizations

No.	Scenario	Multiple choice responses	Answer	Policy Section
1.	The author of a Cochrane Review is employed by a not-for-profit organization that promotes the use of the intervention being examined in the review. Does this comply with the policy?	 Yes, only commercial organizations can have an interest in the outcome of a review. No, the organization has a clear Col. It's unclear – more information is needed. 	Answer 3. It depends whether there are concerns about possible undue influence. If so, this should be referred to the Research Integrity Editors.	Section <u>6.4</u>
2.	The author of a Cochrane Review is employed by a charity that has close ties to the pharmaceutical industry. Does this comply with the policy?	1. Yes, this is acceptable as the author is employed by a notfor-profit organization so there is no financial interest.	Answer 3. In order for this to be acceptable, it needs to be clear that the charity meets the policy definition of a not-for-profit organization. If there are concerns about possible undue influence	Section <u>6.4</u>



No	. Scenario	Multiple choice responses	Answer	Policy Section
		2. No, the links to the pharmaceutical industry make this a clear Col.3. It's unclear- more information is needed.	this should be referred to the Research Integrity Editors.	