

Can medical guidelines adversely affect the health commons?

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MUHC MEDICAL GRAND ROUNDS
Tuesday September 13 2017



Conflicts of Interest

I have no known conflicts associated with this presentation and to the best of my knowledge, am equally disliked by all pharmaceutical and device companies

(and now quite possibly by certain professional societies and their guideline writers)

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Guideline Concerns (not just me)

- “Specifically, this concern extends from limitations in the scientific evidence base on which CPGs rely; a lack of transparency of development groups’ methodologies; conflict of interest among guideline development group members and funders; and questions regarding how to reconcile conflicting guidelines.”

Institute of Medicine (2001) Clinical Practice Guidelines We Can Trust

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Outline

- “Specifically, this concern extends from
- 1. limitations in the scientific evidence base on which CPGs rely; a lack of transparency of development groups’
- 2. methodologies; conflict of interest among guideline development group members and funders; and questions regarding how
- 3. to reconcile conflicting guidelines.”

Institute of Medicine (2001) Clinical Practice Guidelines We Can Trust

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Educational Objectives

1. To appreciate the mechanisms (chance, confounding, and bias) whereby guidelines may inadequately interpret & synthesize the evidence
2. To appreciate the adverse health consequences of guidelines
3. To appreciate how the quality of the guideline process may be improved

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Guidelines – no shortages

U.S. Department of Health and Human Services

AHRQ Agency for Healthcare Research and Quality
Advancing Excellence in Health Care

NATIONAL GUIDELINE CLEARINGHOUSE PREP

Search [TIPS](#)

HOME NEW THIS WEEK GUIDELINE SUMMARIES GUIDELINE SYNTHESIS EXPERT COMMENTARIES

1-20 of 10732 results

“Guideline Summaries”

- Clinical and professional society viewpoints hopefully align as a means to provide evidence-based consensus management recommendations to improve patient care
- Integrity, validity, objectivity and independence are paramount

So why the difference?

- More information than the NEJM paper
 - FDA submission 1000's of pages so deeper uncertainty exploration e.g. benefit in those with normal APC?
 - Negative trial data in other ("different") populations, (RESOLVE, ENHANCE) "borrowing" some of this information, rather than completely ignoring it, seems reasonable
- Methodological issues
 - Protocol was changed during study
 - Study stopped prematurely ?exaggerated
 - Outcome 28 days, longer term benefits?
- Huge cost -> higher burden of proof of value

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What do you get from guidelines for \$2B?

- Replication RCT trial (PROWESS SHOCK - 2011), no benefit, trend for 10% increased mortality (851 APC vs. 845 placebo - 28-day mortality 26.4% vs. 24.2% (RR 1.09; 0.92, 1.28))
- Drug voluntarily withdrawn Nov 2011
- NICE APC guidance withdrawn (2011)
- Drug sales > \$2B (\$200 million annual)

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Benefit inflation with early trials –a one off?

Contradicted and Initially Stronger Effects in Highly Cited Clinical Research

John P. A. Ioannidis, MD
CLINICAL RESEARCH ON MEDICINE

Context: Controversy and uncertainty arise when the results of clinical research on the effectiveness of interventions are subsequently contradicted. Controversies are most pronounced when high-impact research is involved.

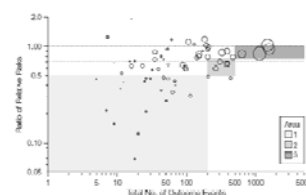
- Examined 39 RCTs from 1999-2003 in 3 high impact journals > 1000 citations
- Found that 9 of 39 highly cited RCTs had later contradicted or markedly reduced effects

Conclusions: Contradiction and initially stronger effects are not unusual in highly cited research of clinical interventions and their outcomes. The extent to which high citations may provoke contradictions and vice versa needs more study. Controversies are most common with highly cited nonrandomized studies, but even the most highly cited randomized trials may be challenged and refuted over time, especially small ones.
JAMA. 2005;294:218-228 www.jama.com

Benefit inflation with early stopping

Stopping Randomized Trials Early for Benefit and Estimation of Treatment Effects Systematic Review and Meta-regression Analysis

JAMA. 2010;303(12):1180-1187

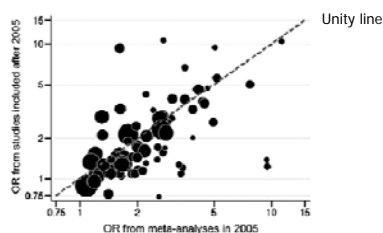


Analysis included 91 truncated RCTs asking 63 different questions and 424 matching nontruncated RCTs

Areas (1-3) correspond to very large (RR 37%) in truncated trials < 200 events, large (RR 0.65) 200-500 events and moderate overestimation (RR 0.88) > 500 events

- **CONCLUSION:** Truncated RCTs were associated with greater effect sizes than RCTs not stopped early. This difference was independent of the presence of statistical stopping rules and was greatest in smaller studies.

Inflation even with (early) meta-analyses



- 80 MA from Cochrane 2005 – updated 2010
- Effect size on average 15% smaller but 33% smaller in MA with < 300 events
- BIGGER PROBLEM IF THE ADDITIONAL STUDIES ARE NEVER DONE, INFLATION NEVER DETECTED

Journal of Clinical Epidemiology 64 (2011) 1060e1069

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What do you get from guidelines for \$20B?

- Tamiflu (oseltamivir) FDA approved 1999, based on limited data from two RCTs
- Supportive evidence from MA (Annals 2003) - 10 trials
- Guidelines (Cochrane (2008), CDC (2008), EMA (2009), WHO (2010)) endorsed Tamiflu to reduce influenza complications and maybe mortality
- CDC recommendation to stockpile medication
- WHO adds to list of essential medications
- Estimates that by 2016 \$20B spent (50% on stockpiling)

BMJ | 12 december 2009 | Volume 339
BMJ 2017;358:j3266 doi: 10.1136/bmj.j3266 (Published 2017 July 13)

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What do you get from guidelines for \$20B?

- MA in Annals (2003) included 10 trials – only 2 published
- Took > 5 years to get the unpublished data
- Cochrane (2014) -> **no** evidence of a reduction in mortality, pneumonia complications or hospital admission (< 1 day reduction in symptoms)
- WHO downgrades essential Rx recommendation (2017)
- Situation described as “multisystem failure” - decisions based on flawed, unpublished evidence
- Complicity of guidelines to this failure “multisystem failure” (?)

BMJ 2017;358:j3266 doi: 10.1136/bmj.j3266
(Published 2017 July 13)

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CCS Guidelines 2012



Canadian Journal of Cardiology 29 (2013) 1394-1395



Society Guidelines Focused 2012 Update of the Canadian Cardiovascular Society Guidelines for the Use of Antiplatelet Therapy

Jean François Tanguay, MD, CSPQ, FRCPC, FACC, FAHA, FESC,* Alan D. Bell, MD, CCPC,¹
Margaret L. Ackman, BSc(Pharm), PharmD, ACPR, FCSI IP,* Robert D.G. Bauer, MD, FRCPC, FACC,*
Raymond Carrier, MD, FRCPC,* Wei-Shuen Chan, MD, FRCPC,¹ James Drouin, MD, FRCPC,*
André Roussin, MD, FRCPC,* Gregory Schnell, BSc, MD, FRCPC,*
Subodh Verma, MD, PhD, FRCSC,² Graham Wong, MD, MPH, FRCPC, FACC,*
and Shamir R. Mehta, MD, MSc, FRCPC, FACC, FESC²

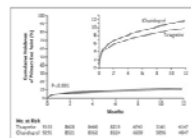
2. We recommend ticagrelor 90 mg twice daily over clopidogrel 75 mg daily for 12 months in addition to ASA 81 mg daily in patients with moderate to high risk NSTEACS (Strong Recommendation, High-Quality Evidence)

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PLATO



Ticagrelor versus Clopidogrel in Patients with Acute Coronary Syndromes



RESULTS

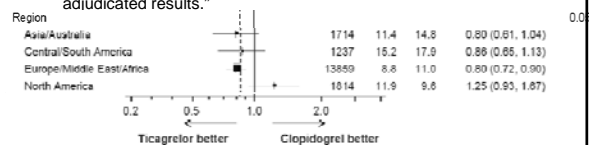
At 12 months, the primary end point — a composite of death from vascular causes, myocardial infarction, or stroke — had occurred in 9.8% of patients receiving ticagrelor as compared with 11.7% of those receiving clopidogrel (hazard ratio, 0.84; 95% confidence interval [CI], 0.77 to 0.92; $P < 0.001$). Predefined hierarchical testing of secondary end points showed significant differences in the rates of other composite end points, as well as myocardial infarction alone (5.8% in the ticagrelor group vs. 6.9% in the clopidogrel group, $P = 0.005$) and death from vascular causes (4.0% vs. 5.1%, $P = 0.001$) but not stroke alone (1.5% vs. 1.3%, $P = 0.22$). The rate of

14 of 16 authors received money from the sponsor

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Uncertainty about PLATO

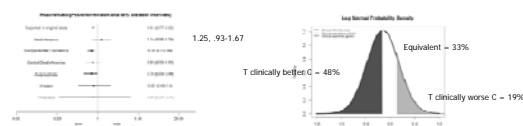
- FDA refused 1st review, accepted 2nd in 2011 dissenting opinions (6-4)
 - “Lack of Robustness of PLATO Superiority with Failure in the US Makes a Confirmatory Study Mandatory.”
 - “Besides failure in the US, superiority was only evident in the adjudicated results.”



- A FDA analysis, not reported in NEJM paper found an increased risk among ticagrelor patients undergoing revascularization within 24 hours (HR 1.9, 95%CI 1.3, 2.8)₂

Accounting for this uncertainty

- Standard analysis treats all patients as independent & identical and make inferences on averages
- Contrary to “personalized” medicine
- Patients are not totally independent as they reside in clusters that can influence outcomes (intensity of other Rx)
- Forces everyone to be a “lumper” or a “splitter”
- Alternative hierarchical model, a statistically justified compromise between these extremes (Efron Sci. Am 1975)



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CDN / ACC-AHA / ESC Guidelines



Canadian Journal of Cardiology 29 (2013) 1394-1395

Society Guidelines Focused 2012 Update of the Canadian Cardiovascular Society Guidelines for the Use of Antiplatelet Therapy

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2. We recommend ticagrelor 90 mg twice daily over clopidogrel 75 mg daily for 12 months in addition to ASA 81 mg daily in patients with moderate to high risk NSTEACS (as defined in PLATO) ^{1,2} or more of (1)

9 of 12 + COI

- “This guideline explicitly does not endorse one of the P2Y₁₂ receptor inhibitors over the other.”
- “The writing group does wish to caution clinicians about the potential increased bleeding risks associated with prasugrel and ticagrelor compared with clopidogrel”

9 of 9 NO COI

2012 ACCF/AHA Focused Update of the Guideline for the Management of Patients With Unstable Angina/Non-ST-Elevation Myocardial Infarction (Updating the 2007 Guideline and Replacing the 2011 Focused Update)

1. We recommend prasugrel 40 mg twice daily over ticagrelor 90 mg twice daily for patients with moderate to high risk of ischemic events (eg, previous myocardial infarction, angina, or stroke) who are not receiving aspirin and who are not receiving aspirin with clopidogrel (as defined in PLATO) ^{1,2} or more of (1)

17 of 17 + COI

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| Guideline COI | | | |
|--------------------------|-----|--------|------------|
| ALL writers | | | NA writers |
| | COI | No COI | Total |
| Authors favoring T>C | 26 | 3 | 29 |
| Authors not favoring T>C | 0 | 9 | 9 |

| ALL writers | | | NA writers |
|--------------------------|-----|--------|------------|
| | COI | No COI | Total |
| Authors favoring T>C | 9 | 3 | 12 |
| Authors not favoring T>C | 0 | 9 | 9 |

- If there is no association between COI and recommending ticagrelor how likely would chance alone be responsible for observing this data
- Answer, < 1 in 100,000!

- If there is no association between COI and recommending ticagrelor how likely would chance alone be responsible for observing this data
- Answer, <1 in 1,000!

Different conclusions CDN vs. US correlates with COI

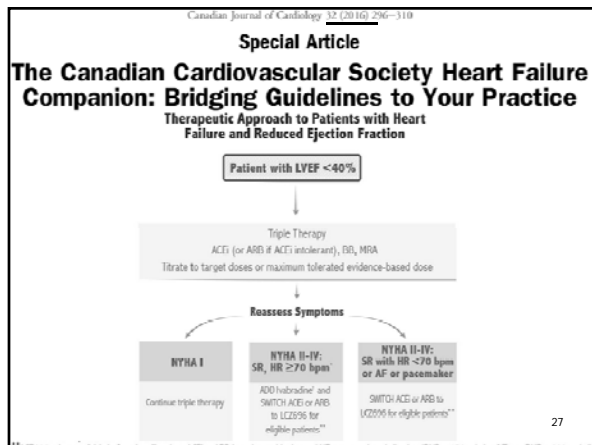
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Is this a sensible recommendation?

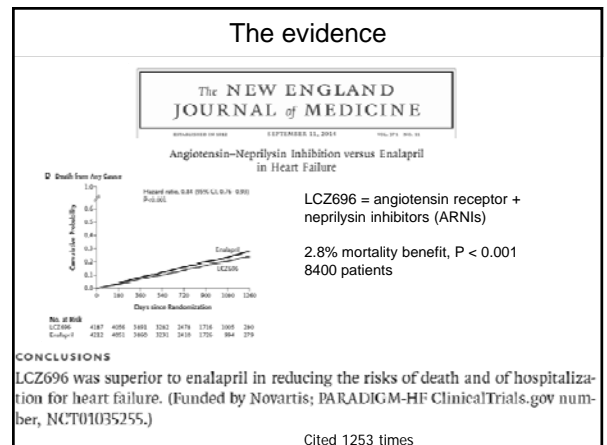
2. We recommend ticagrelor 90 mg twice daily over clopidogrel 75 mg daily for 12 months in addition to ASA 81 mg daily in patients with moderate to high risk NSTE-ACS (Strong Recommendation, High-Quality Evidence)

- PLATO results are not robust
 - Simple change of statistical model nullifies statistical significance
- Totality of the ACS RCT evidence
 - Multiple studies for clopidogrel (credo, cure, commit, caprie, clarity, charisma, oasis-7) > 100,000 pt years
 - 1 study for ticagrelor <7000 pt year with < 1500 NA pt years
- Cost
 - RAMQ Clopidogrel \$14.10 vs. Ticagrelor \$88.80 / month
 - QC 30,000 PCI annually add \$25 MM (\$100 MM CDN)

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Soooo good (Google 430,000 hits)

AUG 30, 2014 @ 07:00 AM 7,859 12 Stocks to Buy Now

PARADIGM-HF Establishes a New Paradigm for Heart Failure Treatment

Medical press Topics Conditions

Latest news Work's top Unread news

Home Cardiology May 18, 2014

PARADIGM-HF trial stopped early for benefit

May 18, 2014

THE BIGGEST BREAKTHROUGH IN HEART FAILURE TREATMENT IN DECADES: PARADIGM-HF TRIAL

BY DR. KENDRA MARSH-KATES, PREVEA CARDIOLOGIST ON OCTOBER 14, 2014

PARADIGM-HF: A NEW LANDMARK HF TRIAL

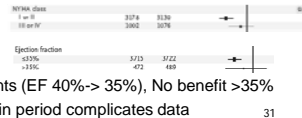
Possible sources of concern (1)

- Is this truly an academic driven trial?

- Independence? –
 - "Data were collected, managed and analyzed by the sponsor"
 - 11/11 NEJM authors received \$ from the sponsor (employment, consultation fees, grants)

Possible sources of concern (2)

- Fair comparison? –
 - 320mg valsartan = 40mg enalapril (FDA recommend)
- Overestimate benefit? –
 - Stopped prematurely known to give exaggerated benefits
- If benefit exists is it due to NEPI?
 - OVERTURE (5770 pts) no benefit for ACE +NEPI vs ACE alone
- Generalizability? –
 - 18,071 screened, 10,537 run-in (58%), 8442 randomized (47%)
 - Only 600 NA patients, < 15% ICD, 40% not on MRA
- Over extrapolation?
 - Only 60 pts with NYHA IV
 - No benefit NYHA 3-4
- Design issues?
 - Several protocol amendments (EF 40%→ 35%), No benefit >35%
 - Unequal single blinded run-in period complicates data interpretation



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Possible sources of concern (3)

- Quality of life benefits? –
 - KC QoL statistically but not clinically significant
- Safety? –
 - Angioedema (trial) reported same 19 vs. 10 (P = 0.13). But safety not truly confirmed may double risk (RR 1.9, 95% CI 0.9 4.1)
 - Angioedema (run-in) (12 enalapril vs. 10 LCZ696). What if LCZ696 given first could be 22 vs 0? In that scenario, total risk 41 vs. 10 (RR 4.2, 95% CI 2.1, 8.2)
 - NEP breaks down amyloid beta protein, pathological marker for Alzheimer's. What is long term cognitive impact of its inhibition?
- Cost?
 - \$ 3.62 per 50 mg, 100 mg, or 200 mg tablet, \$7.20/day
 - About \$4000 extra / year
 - 150,000 CDN CHF patients -> **\$ 600,000,000**

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Canadian Journal of Cardiology 32 (2016) 296–310

Special Article

The Canadian Cardiovascular Society Heart Failure Companion: Bridging Guidelines to Your Practice

Therapeutic Approach to Patients with Heart Failure and Reduced Ejection Fraction

Patient with LVEF <40%

Triple Therapy
ACEi (or ARB if ACEi intolerant), BB, MRA
Titrate to target doses or maximum tolerated evidence-based dose

Given all the uncertainties, only 600 NA patients and enormous cost, is this recommendation sensible?

NYHA I
SR, HR >70 bpm
Switch to ACEi or ARB
Switch to LCZ696 for eligible patients

NYHA II
SR, HR >70 bpm
Switch to ACEi or ARB
Switch to LCZ696 for eligible patients

NYHA III
SR, HR >70 bpm
Switch to ACEi or ARB
Switch to LCZ696 for eligible patients

NYHA IV
SR, HR >70 bpm
Switch to ACEi or ARB
Switch to LCZ696 for eligible patients

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Stroke - Inconsistencies & Overtreatment

Major stroke guidelines and recommendations for alteplase at 3-4.5 hours after stroke onset

Guidelines presenting strong recommendation for (re)alteplase or higher recommendation rating

- American Heart Association/American Stroke Association (Class I Level of Evidence A)
- Canadian Stroke Network and Heart and Stroke Foundation of Canada (Evidence level A)
- Chinese Stroke Therapy Project Panel for Intravenous Recombinant Tissue Plasminogen Activator (Level I recommendation, Level A evidence)
- European Stroke Organisation (Class I, Level A)
- Health Australia (evidence level A)
- Japan Stroke Society (Level of evidence by grade of recommendation A)
- National Institute for Health and Care Excellence (No recommendation)
- National Stroke Foundation (Australia) (Level A)
- South African Stroke Society (Level A)

Guidelines presenting weak recommendation for (re)alteplase or higher recommendation rating

- American College of Chest Physicians (Grade 2C)
- American College of Emergency Physicians/American Academy of Neurology (Level II recommendation), currently being reconsidered by American College of Emergency Physicians
- American College of Emergency Physicians (Level II recommendation)

Guidelines presenting weak recommendation against

- Canadian Association of Emergency Physicians (weak recommendation, moderate quality evidence)

Statements that tPA is controversial at all timepoints and should not be considered standard of care

- Stroke in Australia (Emergency Medicine)
- Australian College of Emergency Medicine
- Canadian Association of Emergency Physicians (currently under policy)
- New Zealand Society of the Australian College for Emergency Medicine

Key messages

Use of alteplase 3-4.5 hours after stroke is supported by guidelines and meta-analyses based on analyses that do not directly examine treatment in this time frame

Direct comparisons of alteplase with no alteplase at 3-4.5 hours after stroke suggest an absolute increase in mortality of 2% and no clear benefit

Recommendations to use alteplase 3-4.5 hours after stroke should be re-evaluated

BMJ 2015;350:h175

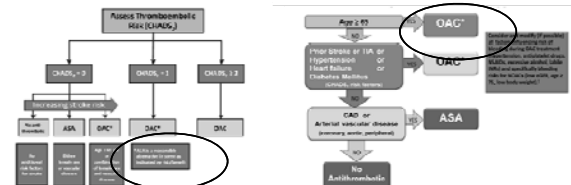
Cochrane - Inconsistencies & Overtreatment

- 2012** - Reductions in all-cause mortality, major vascular events and revascularisations were found ... Only limited evidence showed that primary prevention with statins may be cost effective and improve patient quality of life. Caution should be taken in prescribing statins for primary prevention among people at low cardiovascular risk. (RR 0.84, 95% CI 0.73 to 0.96) - mortality
- 2013** - Reductions in all-cause mortality, major vascular events and revascularisations were found with no excess of adverse events among people without evidence of CVD treated with statins. Caution in the use of statins in people at low risk of cardiovascular events is no longer tenable. (OR 0.86, 95% CI 0.79 to 0.94) - mortality

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<http://online.library.wiley.com.proxy3.library.mcgill.ca/doi/10.1002/14651858.CD004816.pub5/full>

CCS - Inconsistencies & Overtreatment



Industry influences

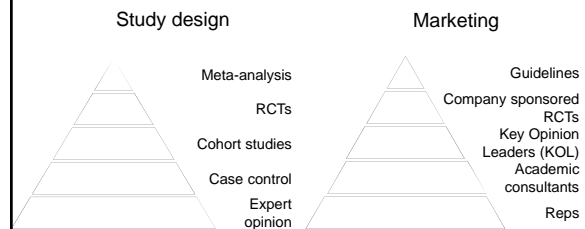
Undue industry influences that distort healthcare research, strategy, expenditure and practice: a review

Emmanuel Stamatakis^{1,2}, Richard Weiler³ and John P.A. Ioannidis^{4,5} Eur J Clin Invest 2013; 43 (5): 469-476

Conclusion: industry masterfully influences evidence base production, evidence synthesis, understanding of harms issues, cost-effectiveness evaluations, clinical practice guidelines and healthcare professional education and also exerts direct influences on professional decisions and health consumers. There is an urgent need for regulation and other action towards redefining the mission of medicine towards a more objective and patient-, population- and society-benefit direction that is free from conflict of interests.

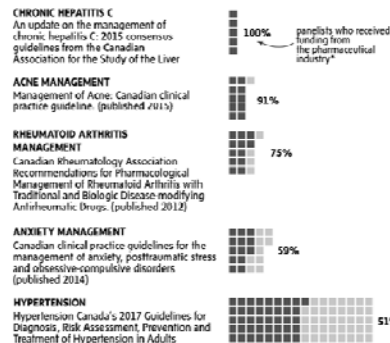
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Two Pyramids of "evidence based medicine"



COI are pervasive

Funding of medical guidelines by the pharmaceutical industry



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Anxiety

- Anxiety Disorders Association of Canada - CMAJ 2014
- 9 antidepressants drug makers, Prozac, Zoloft and Paxil, paid \$205,000 for flights, meals and hotel rooms for the meeting and paid 2 medical writers to research and draft the final guideline paper.
- One of the 10 most-frequently accessed of 1,200 CPG in CMAJ database

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Red flags for COI in guidelines

Box 1: Red flags that should raise substantial skepticism among guideline readers (and medical journals)

- Sponsor(s) is a professional society that receives substantial industry funding.
- Sponsor is a proprietary company, or is undeclared or hidden
- Committee chair(s) have any financial conflict*
- Multiple panel members have any financial conflict*
- Any suggestion of committee stacking that would pre-ordain a recommendation regarding a controversial topic
- No or limited involvement of an expert in methodology in the evaluation of evidence
- No external review
- No inclusion of non-physician experts/patients representative/community stakeholders

*Includes a personal or other financial relationship with a proprietary health care company and/or whose clinical practice/specialty depends on tests or interventions covered by the guideline

Ensuring the integrity of clinical practice guidelines
BMJ 2013;347:f5535 doi: 10.1136/bmj.f5535
(Published 17 September 2013)

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Mechanisms leading to low quality guidelines

- Poor estimation of evidence quality
 - Uncritical evaluation -> provides veneer of study integrity, objectivity, scientific validity and independence to sometimes questionable evidence
 - Unrecognized hazards of early adoption, "exaggerated" initial results, esp. with early stopping
 - Large effect sizes - if it is too good to be true, it probably isn't true
 - Lack of recognition of potential role of bias (even with RCTs)
 - Have meaningful outcomes been measured?
 - Inability to accumulate scientifically in presence of uncertainty
 - Ignoring importance of study publication, replication and data sharing made available for independent reanalysis -> AllTrials (<http://www.alltrials.net/>)

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Mechanisms leading to low quality guidelines(2)

- Propagates cult of presumption of benefit allowing + studies to get disproportionate support
 - Over-confidence bias
 - Discount negative studies, side effects (harm)
- Cognitive biases & subjectivity of the guideline process
 - “Stacking the deck” -> Belief bias
 - Group bias
 - Vociferous champions can dominate the guideline process (ad hominem attacks)
- Conflicts of interest (financial and non-financial) may favor a different agenda than improving patient care
 - Industry viewpoint of guidelines may be potential marketing tool
 - Most guideline chairpersons and panel members in CDN have COI³

Adverse health consequences of guidelines

- Can encourage acceptance of marginal or ineffective therapies as “standard of care”
- Can encourage overtreatment
- Can divert limited funds to ineffective treatments – no consideration of cost effectiveness (societal viewpoint)
 - Money wasted is money not spent on other public health priorities.
- Can inhibit local critical assessment of the evidence
- Can inhibit clinical judgement and patient preferences in routine decision making
- Can inhibit the scientific process as provides false certainty -> removes impetus for replication studies & data sharing to resolve residual uncertainty
- Ultimately -> less research to find and confirm truly effective drugs

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Improving the process

- Enhance multidisciplinary committee composition (methodologists, multi-stakeholder, multi-disciplinary)
- Expand mandate to include the domains of economics, meaningful patient outcomes
- Enhance transparency of the process
- More critical appraisal process with SR & better reasoning under uncertainty
- Better COI management (remove all COI from decision making – declaration alone insufficient)

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Thank you!



“Everybody gets so much information all day long that they lose their common sense” – Gertrude Stein

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