CONFLICT OF INTEREST AND DISCLOSURES POLICY AND PROCEDURES

The Society of Critical Care Medicine (SCCM), as accredited by the Accreditation Council for Continuing Medical Education, the Accreditation Council of Pharmacy Education, and other accrediting bodies, must ensure balance, independence, objectivity, and scientific rigor in all educational activities. This includes the development and dissemination of evidence-based clinical and administrative guidelines. These standards are also upheld by the European Society of Intensive Care Medicine in following all required rigor with conflict of interest (COI) that applies across the European Union. Because the Surviving Sepsis Campaign (SSC) is a joint project of the two societies, they collaborate on upholding the process of managing COI.

A. Appointments to the Guidelines Panel

All committee members and panelists participating in the development and publication of the SSC guidelines are required to disclose their relevant financial, intellectual, legal and duplicative relationships prior to appointment as cochairs, co-chair chair, methodologists, group heads, and panelists. These appointment-related COIs are reviewed by two independent appointed COI cochairs. Their duty is to assure that COI analysis and management is upheld from the start of the guidelines process through submission for journal publication, working closely with the guidelines leadership.

B. Relationships Related to COI

An individual has a financial relationship if they have a financial exchange in any amount (assessed periodically and throughout guidelines process) with a commercial interest whose products or services are discussed as part of the activity over which the individual has control. An individual has an intellectual COI if he/she is biased based on related research, academic influences, or fundamental beliefs or demonstrate biases not based on published rigorous science.

Monetary interests or other relationships may represent both financial and intellectual COI. These include such relationships as grants or research support (government, foundation, or industry), employment, consultancy, major stock holdings, or paid membership in a speaker’s bureau, among others. The intent of full disclosure is not to prevent a member with a financial or other relationship from making contributions to the guidelines but rather to ensure unbiased and balanced contributions.

Legal conflicts are addressed if a member of the guidelines leadership, panel, or consultants serve as an expert witness or serve as an expert advisor during the guidelines development process directly related to the subject matter. A conflict will also exist if any of the same individuals serve on a guidelines development task force on the same subject matter as is being addressed in any SSC guidelines.

C. Disclosure Requirements

An individual who refuses to disclose relevant relationships or withholds pertinent information will be disqualified from serving on the guidelines panel and cannot have control of, or responsibility for, the development, management, presentation, or evaluation of the guidelines. Contributors will be asked to complete an online volunteer disclosure form at certain stages of guidelines development or when material changes occur.
D. Resolution

Any person disclosing potential COI, whether financial or intellectual, must agree to work with the guidelines COI cochairs toward resolution since disclosures or disclaimers alone are not appropriate mechanisms to resolve COI. The SSC guidelines COI processes are held to a higher standard than simple disclosure to ensure independence from commercial and, where pertinent, intellectual influence. It is necessary for all parties to work together toward resolution. Ultimately it is the responsibility of the COI cochairs to oversee this due diligence function to ensure the integrity of the guidelines.

If COIs cannot be resolved by the guidelines COI leadership and cochairs, the SSC Steering Committee chairs are consulted and the matter can be escalated to the SSC Executive Committee if necessary. SCCM’s whistleblower policy applied on behalf of both organizations allows for reporting activities in violation of the COI policy.

Resolution of COI may include:

1. Abstaining from discussions and/or voting specifically related to the COI
2. Reassignment to another subject matter subgroup
3. Divesture of the relationship
4. Resignation from the guidelines leadership or panel

E. Types of Conflict of Interest

- Financial interest in a company whose services or products relate to the guidelines subject matter.
- Scientific investigations, including those funded by industry and other sources, that are active during the guidelines development process and are related to the area of guidelines focus.
- Travel support to meetings from industry sponsors with vested interests in the guidelines subject matter.
- Involvement in guidelines being developed by other organizations with the same or very similar PICO questions.
- Active testimony in a legal case involving the guidelines subject matter,
- Intellectual COI can occur when clinicians or researchers are so deeply involved with the subject matter via either practice or research that their objectivity is in question. Principal investigators to include first and senior authors on research trials directly related to the guidelines’ subject matter PICO questions may be asked to abstain from voting because of intellectual COI. The U.S. Department of Health and Human Service’s Office of Research Integrity has more information on personal and intellectual COI.

Concerned parties can contact ssc@sccm.org.