Management of Conflicts of Interest in the Development of Clinical Practice Guidelines

Approved: August 2025

Any financial relationships that could influence professional judgment or integrity must be disclosed and managed appropriately to maintain public trust and uphold the integrity of medical practices and guidelines (Council of Medical Specialty Societies' "Code for Interactions with Industry" 2015). Managing conflicts of interest involves transparency, disclosure, and the implementation of measures to minimize their impact on professional judgement and ultimately patient care.

Definitions	
Conflict of Interest	A situation in which an individual has competing interests due to personal or financial considerations and these competing interests have the potential to compromise or bias professional judgment and objectivity.
Financial Interest	A position or relationship held by an individual that offers potential gain or loss of monetary value, such as employment, stock ownership, payment for services, or gifts given with the expectation of reciprocity.
Direct financial interest	Wages, consulting fees, honoraria, or other compensation (in cash, in stock or stock options, or in kind paid to the individual or to another entity at the direction of the individual, for the individual's services or expertise. Direct financial interest does not mean stock ownership or intellectual property licensing arrangements. (Council of Medical Specialty Societies' "Code for Interactions with Industry" 2015).
Indirect financial interest	A financial interest that is owned or received via an intermediary, e.g., research funding to an individual received through the individual's academic institution.
For-profit healthcare company	A for-profit entity that develops, produces, markets, or distributes drugs, devices, services, or therapies used to diagnose, treat, monitor, and manage health conditions. This definition is not intended to include non-profit entities, entities outside of the healthcare sector, or entities through which physicians provide clinical services directly to patients. (Council of Medical Specialty Societies' "Code for Interactions with Industry" 2015).

Eligibility for Appointment to a NANS GDG

Individuals with minimal to no conflict of interest are preferred for NANS Guidelines Development Group (GDG). While the Guideline Oversight Committee may choose to include an individual with some degree of conflict for a GDG, it is preferred that the majority of participants will have no conflict or minimal conflict, defined as $10,000 or less in financial interest in aggregate in for-profit companies.

To participate in a guidelines activity, a GDG member may not have more than $15,000/year in conflicts with any one for-profit healthcare company and no more than $50,000/year in aggregate with for-profit healthcare companies over the past 24 months.

It is strongly preferred that GDG members do not currently have any of the following interests and have not any such interests within the past 24 months:

- Direct financial interests of >$10,000/year in for-profit healthcare companies
- Public statements expressing a strong intellectual position on a guideline question
- Leadership role with a non-profit organization that reasonably could be directly affected by the guidelines or leadership role (e.g., board member or director) for any for-profit healthcare company
- Patents or other ownership interests in products that could be affected by the guidelines
- Recent speaking on behalf of a for-profit healthcare company (e.g., speaker bureaus, but not including accredited CME)
- On a case-by-case basis, any conflict of interest judged to be important by the Guideline Oversight Committee
- Individuals who have had such interests within the past 24 months, but do not currently hold them, may be considered for appointment if they offer crucial expertise, are willing to comply with NANS policy, and the nature of their past interest(s) is such that the interest(s) can be appropriately mitigated given the make-up of the remainder of the GDG.
- Equity, options, royalties—ownership or employee—relevant to the substance of the guideline

Individuals considered for a GDG often have indirect financial interests in for-profit healthcare companies, e.g., research funding, as well as intellectual, professional, or reputational interests in the guideline topic. GDGs will be intentionally composed with the goal of avoiding a majority of the GDG having the same or similar conflict of interest, including conflicts that are indirectly financial or not mainly financial.

- Eligibility will be determined through a variety of approaches, including interview, disclosure collection, and checking of public records.

Chairs are additionally preferred to not have current a leadership role (e.g., principal investigator) for a research study that addresses a guideline question.

- If by special exception a chair is allowed to have any of the conflicts described above, a co-chair and a vice-chair must not have the same or similar conflict.

Disclosure

Upon submission of an application for appointment to a NANS GDG, individuals must disclose:

- for themselves and their spouse all direct financial interests in for-profit healthcare companies held currently and/or within the past 24 months
- for themselves, all indirect financial interests in for-profit healthcare companies held currently and/or within the past 24 months
- for themselves, all other current financial interests (i.e., in other entities, patents, etc.) that may be affected by the subject matter of the guidelines, and any relevant nonfinancial interests.
- GDG members must maintain disclosures throughout the guideline development process. NANS will prompt for updates.
- Disclosures are published with the guidelines.

Avoidance of New Conflicts

From time of appointment to publication of the guidelines, individuals on a GDG, regardless of role, must:

- Not accept direct payments or transfers of value >$10,000/year from any single for-profit healthcare companies.
- Not accept paid speaking ("speaker bureaus") positions from for-profit healthcare companies.
- Disclose any new direct and indirect financial interests with for-profit healthcare companies and any new relationships with other entities that reasonably could be expected to be relevant to the guidelines.
- Check disclosures made to NANS against publicly available information such as Open Payments and explain discrepancies.
- Avoid participation in simultaneous guideline efforts by other organizations on the same topic.
- Attest compliance with the above when requested by NANS.

Management of Allowed Conflicts

- All allowed conflicts are managed through disclosure and group discussion.
- A member of a GDG who is not a chair will serve as the COI Compliance Monitor. Throughout the development process, the COI Compliance Officer will review disclosures, facilitate discussions by the GDG about conflicts before each call or meeting, and facilitate recusal or other mitigation methods when required as described below.
- On a recommendation-by-recommendation basis, certain conflicts also may be managed through recusal:
    - Current direct payments or transfers of value >$10,000/year from a for-profit companies that could be directly affected by that recommendation, i.e., in rare cases where the individual is not dismissed for same
    - Leadership role (e.g., principal investigator) for a research study relevant to the guideline question
    - Other important conflicts at the discretion of GDG members, chairs, or the Guideline Oversight Subcommittee
- Final decisions about recusal (e.g., in the case of disagreements) are made by the Guideline Oversight Committee.
- Recused individuals may participate in question formulation, review and discussion of evidence, and manuscript writing but are recused from making judgments about evidence or decisions about the direction or strength of recommendations.
- Recused individuals may be asked to leave the meeting. This will be decided by the Guideline Oversight Committee on the basis of risk of influence.
- If >49% of the GDG must be recused for a guideline question, the GDG may not address the question.

Guideline Publication

- A section of the published guidelines will describe how conflicts were managed.
- Complete disclosure forms are published as a supplement to the guidelines.
- For 1 year after publication, all GDG members are discouraged from speaking on behalf of for-profit healthcare companies that could be affected by the guidelines.

Sponsorship and Funding

- NANS does not accept direct support from for-profit healthcare companies for the development of guidelines. After guideline development is complete, such company funding

may be accepted to support distribution, translation, or repurposing of the guideline content.
- Governmental, nonprofit, or individual philanthropic funding of NANS guideline development and publication may be accepted. In such cases, the role of the funder in the development of the guideline is determined on a case-by-case basis by the Guideline Oversight Committee. External sources of funding and the role of the funding organizations or individuals are described in the published guideline.

Acknowledgements

NANS formulated this policy based on the American Society of Hematology's "Management of Conflicts of Interest in the Development of Clinical Practice Guidelines" (2021) and the Council of Medical Specialty Societies' "Code for Interactions with Industry" (2015).

Amendment: Limited Exception Pathway for Practice Recommendations and Consensus Documents

Approved: July 2026

The Guideline Oversight Committee (GOC) may, on a project-specific basis, approve limited exceptions to the standard NANS Conflict of Interest Policy for Practice Recommendations, Consensus Statements, Best Practice Documents, and other implementation-focused guidance documents when specialized expertise is deemed necessary for the development of the publication.

Applicability

This exception pathway may be considered only for documents focused on clinical implementation, procedural guidance, consensus recommendations, or best practices.

Documents primarily intended to establish levels of evidence, appropriateness of care, indications for therapy, efficacy, safety, or treatment recommendations shall remain subject to the standard NANS Conflict of Interest Policy without modification.

The determination of whether a project is eligible for this exception pathway shall be made by the GOC prior to appointment of project leadership or authorship.

Leadership Requirements

All Executive Committee members, Section Leads, Chairs, Co-Chairs, and other individuals responsible for directing the content, evidence review, recommendation development, or final approval of the document shall remain subject to the standard NANS Conflict of Interest Policy.

No exceptions shall be granted for these leadership positions.

Author Participation Exceptions

The Executive Committee, in consultation with the COI Monitor and subject to approval by the GOC, may permit a limited number of authors whose disclosures exceed standard NANS eligibility thresholds to participate in guideline development when:

- The author possesses expertise considered important to the project;
- The conflict has been fully disclosed and reviewed;
- Appropriate mitigation strategies have been established; and
- Participation is determined to be in the best interest of the project.

Such exceptions shall be considered on a case-by-case basis and shall not constitute precedent for future projects.

Composition Requirements

No more than ten percent (10%) of non-leadership authors may participate under this exception pathway.

The remaining authors shall meet all eligibility requirements of the standard NANS Conflict of Interest Policy.

The GOC may impose a lower threshold when deemed appropriate based on the topic, scope, or level of potential conflict.

Conflict Management and Transparency

All disclosures shall be publicly reported in accordance with NANS policy.

Authors participating under an approved exception may be required to recuse themselves from discussion, drafting, voting, or approval of specific recommendations at the discretion of the Executive Committee, COI Monitor, or GOC.

The final publication shall include a statement describing the use of this exception pathway, the rationale for its use, and the methods employed to mitigate potential conflicts of interest

Table. NANS Management of Conflicts of Interest in the Development of Clinical Practice Guidelines

COI Status	Explanation	Exec Team (Leads)	GDG (Co-Authors)	Management	Change from 2025 Policy
No Conflict	Without conflict, per NANS Policy Guidelines.	Eligible	Eligible	May Serve	No change
Conflicted - Minimal	Less than $10,000 total conflicts in a year across all companies.	Eligible	Eligible	May Serve	No change
Conflicted - Moderate	Less than $15K per year from any one company or more than $50K in total conflicts a year across all companies. No options or equity in a company relevant to the topic of the guidelines.	Eligible	Eligible	May Serve	No Change
Conflicted – High	Total conflict exceeds $15K in one year from one company or $55K in total conflicts across all companies in a year. Holds options or equity in a company relevant to the topic of the guidelines. Other criteria as determined by the Guidelines Oversight Committee.	Not Eligible	May be considered by exception only (10% threshold)	Subject to COI Monitor review and GOC determination of eligibility and scope of participation.	**Amended Policy as of July 2026**