



Margaret Hamburg, MD  
Commissioner, US FDA  
10903 New Hampshire Ave.  
Silver Spring, MD 20993

August 7, 2011

Dear Dr. Hamburg:

The National Physicians Alliance (NPA) is a multispecialty medical organization committed to advancing the core values of the profession: service, integrity, and advocacy. Our first guiding principle states: "We place the best interests of our patients above all others and avoid conflicts of interest and financial entanglements. The health of our patients is our first concern [from the World Medical Association 1948 Declaration of Geneva, Physician's Oath]." The NPA strongly supports the FDA's mandate and work to assure safe and effective pharmaceuticals and devices.

For this reason we are dismayed to learn that you have suggested loosening conflict of interest guidelines for FDA advisers on the grounds that the FDA has difficulty identifying industry-independent experts. Multiple studies, such as Amy Wang's study published last year in the British Medical Journal, continue to show how an expert's industry affiliations will affect his or her position on a drug's risk profile. We understand and decry the increasing entanglement of many researchers and clinicians with industry and understand that finding reviewers without conflicts can be a challenge. However, many of our expert colleagues do remain free of those entanglements and their position should be valued. Nearly half of the expert cardiologists that develop clinical practice guidelines for the American College of Cardiology and the American Heart Association do not have conflicts of interest [Mendelson T, Archives of Internal Medicine, 2011].

The New America Foundation has developed a list of industry-independent experts from a variety of disciplines. We endorse this list, which includes some of the most renowned researchers, epidemiologists, and specialists in the world, including Barnett Kramer, newly appointed director of National Cancer Institute's Division of Cancer Prevention and current editor of the Journal of the National Cancer Institute; Robert C. Solomon, America College of Emergency Physicians, medical editor-in-chief, ACEP News; and Bruce Psaty, Professor of Medicine and Epidemiology, University of Washington Cardiovascular Health Research Unit.

If you have not already done so, we encourage you to read the article, "Naming names: Is there an (unbiased) doctor in the house?" published in 2008 in BMJ, listing the names of industry-independent experts. Top news organizations in the country, including the New York Times, Bloomberg, and the Wall Street Journal, have relied upon sources cited in the BMJ article. The list of unbiased experts is updated regularly. A copy of the original article is attached for your review, and the most recently updated list can be found here: <http://www.healthnewsreview.org/list-of-independent-experts.php>.

We hope your agency finds this list useful, as have journalists and others. As the list is currently undergoing another revision, we will gladly forward the new list to you as soon as possible. Unavoidable bias is introduced by reliance on industry-affiliated experts and has contributed to patient harms and scandals, such as FDA panelists with industry influence advising on decisions surrounding Vioxx. For this reason, we strongly encourage you to reconsider any loosening of conflict of interest rules for FDA advisers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Valerie Arkoosh', with a long horizontal flourish extending to the right.

Valerie Arkoosh, MD, MPH  
President