



# 2014: ACG-FDA Public Forum

## American College of Gastroenterology & U.S. Food and Drug Administration

*Toward Improving the Quality of  
Colonoscopy: Evidenced-Based State of the Art in Bowel  
Preparation*

Sponsored by the ACG FDA Related Matters  
Committee



# Agenda & Speakers

## Moderators:

Lawrence Cohen, MD, FACG

Robert Fiorentino, MD (FDA)

## Topics:

The FDA perspective on bowel preparation registration trials (Robert Fiorentino, MD)

What is the evidence for an optimal dosing scheme and bowel preparation formulation? (Paul Moayyedi, MD)

What are the immediate and delayed safety issues surrounding over the counter and prescription bowel preparations? (Philip Schoenfeld, MD)

What are the optimal endpoints for assessing bowel preparation in clinical practice or trials? (Douglas Rex, MD)

Open Forum Discussion



# **ACG 2014 Bowel Prep Workshop**

## **FDA Perspective**

Robert P. Fiorentino, M.D., M.P.H.  
FDA, Division of Gastroenterology & Inborn Errors  
October 2014

# Outline

- Case Studies: Safety
  - Visicol / Osmoprep (phosphate nephropathy)
  - HalfLytely (ischemic colitis)
- General Efficacy Remarks
  - Shared Goals
  - Endpoint Selection
  - Noninferiority design considerations
  - Choice of Regimen
    - *(day before, same day or split dose?)*
  - “Combination Rule”

# FDA Approved Bowel Cleansing Products

## Oral Sodium Phosphate Preps

- Visicol (2000)
- OsmoPrep (2006)

## Sulfate Salt Preps

- SUPREP (2010)

## Polyethylene Glycol Preps

- GoLYTELY (4L) (1984)
- Colyte (4L) (1984)
- OCL Solution(4L) (1986)
- NuLYTELY(4L) (1991)
- Moviprep (2L) (2006)

## Others (Combinations)

- HalfLyte (2004, 2007, 2010)
- Prepik (2012)
- Sucralfate (2013)

# Case Study: Sodium Phosphate Preps

- In September 2003, Desmeules et al published a case report of acute phosphate nephropathy followed by persistent renal insufficiency in a 71-year old woman who took 90 mL of an OSP solution as a cathartic.
- In November 2005, Markowitz et al published a case series study describing 21 **biopsy-proven** cases of acute phosphate nephropathy in patients who took OSP and had no history of hypercalcemia or superimposed renal pathology.
  - 18 patients were diagnosed with acute renal failure within 2 months of colonoscopy, and all were diagnosed within 5 months.
- FDA review of the above literature and the FDA Adverse Event Reporting System (AERS) revealed 10 additional unique cases of renal failure associated with use of OSP solution and 10 cases of renal failure associated with use of OSP tablets.



# Case Study: Sodium Phosphate Preps

- In 2006, FDA took steps to include information regarding the risk of acute phosphate nephropathy associated with the use of OSP products for bowel cleansing to the WARNINGS section of the existing prescription labeling for Visicol, as well as OsmoPrep.
- In 2006, the Agency issued an FDA Alert on OSP products for bowel cleansing (2006 FDA Alert), which included information for healthcare professionals and patients, and a science background paper (*links provided below*).

**For more information:**

<http://www.fda.gov/Drugs/DrugSafety/PostmarketDrugSafetyInformationforPatientsandProviders/ucm126084.htm>

<http://www.fda.gov/Drugs/DrugSafety/PostmarketDrugSafetyInformationforPatientsandProviders/ucm161581.htm>

# Case Study: Sodium Phosphate Preps

- In 2008, FDA conducted a new analysis of the AERS reports involving OSP-associated acute phosphate nephropathy, as well as a review of the recent medical literature
  - Between 2006 to 2008 there were 20 reported cases of kidney injury associated with the use of OsmoPrep, 3 were biopsy-proven cases of acute phosphate nephropathy.
  - The onset of kidney injury in these cases varied, occurring in some within several hours of use of these products and in other cases up to 21 days after use.
- This review demonstrated that acute phosphate nephropathy could lead to serious kidney injury, requiring dialysis or kidney transplant, and in rare instances, death.
- FDA determined that, “taking steps to ensure that healthcare providers and their patients are better informed about the risk of OSP-associated acute phosphate nephropathy might help to decrease the number of these adverse events.”



# Case Study: Sodium Phosphate Preps

- **This information resulted in:**
  - A determination that OSP oral solution for *bowel cleansing* are prescription products and not available over the counter (*laxatives still OTC*)
  - A Boxed Warning within the Osmoprep and Visicol labels
  - The Development of and distribution of a Medication Guide and a Communication Plan
  - Postmarketing clinical trials needed to evaluate safety
    - *Randomized, controlled clinical trial evaluating the risk of developing acute kidney injury, comparing patients undergoing bowel cleansing using prescription OSP products to patients undergoing bowel cleansing using PEG-containing products.*

# Case Study: HalfLytely

- HalfLytely/Bisacodyl Bowel Prep Kit was originally developed to reduce the prep volume (2L) compared to standard bowel preparations (4L)
- HalfLytely was approved in 2004 with a bisacodyl dose of 20 mg.
- Following this approval, several reports of ischemic colitis were received.
- In May 2006, HalfLytely labeling was revised to include reports of ischemic colitis (IC)
- IC reports were suspected to be related to the dose of bisacodyl (20 mg) included in the original kit.
- The dose of bisacodyl was reduced from 20 mg to 10 mg in 2007. Data demonstrated similar efficacy between HalfLytely with 20 mg bisacodyl and HalfLytely with 10 mg bisacodyl.

# Case Study: HalfLytely

- Although the risk of ischemic colitis is low (about 1 in 100,000 for the HalfLytely and bisacodyl 20mg prep) it appeared to be reduced by the dose reduction to 10 mg based on post-market reporting.
- In the approval letter for the HalfLytely and Bisacodyl (10 mg) Bowel Prep Kit the FDA requested that additional studies be performed to evaluate lower doses of bisacodyl.
- A trial compared HalfLytely with 5 mg of bisacodyl to the approved HalfLytely with 10 mg of bisacodyl.
- After the marketing of the HalfLytely and Bisacodyl (10 mg) Bowel Prep Kit , 3 cases of ischemic colitis were reported.
- Ultimately, the dose of Bisacodyl in the Bowel Prep Kit was reduced to 5mg.

# Communicating Safety

- Oral sodium phosphate products for colon cleansing now have boxed warnings
- Prescription bowel prep labels contain similar *Warnings & Precautions*
  - **Serious Fluid and Serum Chemistry Abnormalities**
  - **Cardiac Arrhythmias**
  - **Seizures**
  - **Use in Patients with Renal Impairment**
  - **Ischemic Colitis**

# More Recent Trials...

- Assess renal and hemodynamic safety
  - Orthostatic BP measurements on the day of colonoscopy
  - More distal renal function assessment timepoints post colonoscopy
- Assess risk factors for renal injury
  - Antihypertensive drugs / discontinuation
  - IV fluids other therapies peri-colonoscopy

# Efficacy: Consider Our Goals

- ✓ Excellent visualization of the mucosa
- ✓ Adequate visualization of all segments (e.g., ascending colon)
- ✓ Appropriate timing of administration prior to endoscopy
- ✓ Ease for patient (i.e., completion of prep)

# Efficacy Considerations

- There isn't a universally accepted endpoint model to assess efficacy. *Why not?*
  - Trial proposals reviewed on a case-by-case basis
  - Typically see multiple outcome scales and definitions of study success for each prep
  - Various approaches used to evaluate colonic segments (e.g., ascending colon)
  - Evaluation of bowel preps could benefit from a standardized approach

# Efficacy Considerations

- Non-inferiority “*creep*”
  - Important to maintain efficacy of products over time, especially if goal is to have the “*lowest volume prep*”
- Various clinical programs evaluating day before colonoscopy, day of colonoscopy or split dose regimens, *and various combos*
  - Recent split dose regimens have been labeled as the *Preferred Regimen*



# “Combination Rule”

- Various combination of osmotic agents (PEG, salts) with or without laxatives are possible, each having a contribution to the bowel cleansing
- Regulations (21 CFR 300.50) require that:

**Two or more drugs may be combined in a single dosage form when each component makes a contribution to the claimed effects** and the dosage of each component (amount, frequency, duration) is such that the combination is safe and effective for a significant patient population requiring such concurrent therapy as defined in the labeling for the drug.

# “Combination Rule”

- E.g., the combination should be better than the components alone
- How do you demonstrate that each component of a bowel prep makes a contribution to the claimed effect?
- Burden of proof rests with the sponsor
- *Imagine all the combinations possible...*

# Wrap Up

- We need to be vigilant to the safety of preps given the history of these products
- Common goal: maximize the rate of excellent preps (positive public health impact)
- Maintain excellence across new products and dosing regimens
- Don't sacrifice these for convenience only
- Plenty of opportunity for standardization of endpoints and trial designs



**U.S. Food and Drug Administration**  
Protecting and Promoting Public Health

[www.fda.gov](http://www.fda.gov)

***Thank You!***

# What is the evidence for an optimal dosing scheme and bowel preparation formulation?

Paul Moayyedi

Co-Editor in Chief of American Journal of Gastroenterology

Director, Division of Gastroenterology

Richard Hunt/AstraZeneca Chair

McMaster University, Hamilton Ontario, Canada

# Disclosures

- No relevant financial declaration

# Introduction

- Type of bowel preparation
  - 4 liter PEG
  - 2 liter PEG
  - Sodium picosulfate
  - Oral sulfate solutions
- Previous day versus split dose
- Same day versus split dose
- How GRADE assessment can guide future RCTs

# Information evaluated

- Previous systematic reviews of RCTs
- RCTs identified by Medline search
- Meta-analyses



## Optimizing Adequacy of Bowel Cleansing for Colonoscopy: Recommendations From the US Multi-Society Task Force on Colorectal Cancer

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*Am J Gastroenterol* 2014; 109:1528–1545; doi:10.1038/ajg.2014.272; published online 16 September 2014

Colorectal cancer (CRC) is the second leading cause of cancer-related deaths in the United States (1). Colonoscopy can prevent CRC by the detection and removal of precancerous lesions. In addition to CRC screening and surveillance, colonoscopy is used widely for the diagnostic evaluation of symptoms and other positive CRC screening tests. Regardless of indication, the success of colonoscopy is linked closely to the adequacy of prep procedure bowel cleansing.

Unfortunately, up to 20–25% of all colonoscopies are reported to have an inadequate bowel preparation (2,3). The reasons for this range from patient-related variables such as compliance with preparation instructions and a variety of medical conditions that make bowel cleansing more difficult to unit-specific factors (eg, extended wait times after scheduling of colonoscopy) (4). Adverse consequences of ineffective bowel preparation include lower adenoma detection rates, longer procedural time, lower cecal intubation rates, increased electrocautery risk, and shorter intervals between examinations (3,5–7).

Bowel preparation formulations intended for precolonoscopy cleansing are assessed based on their efficacy, safety, and tolerability. Lack of specific organ toxicity is considered to be a prerequisite for bowel preparations. Between cleansing efficacy and tolerability, however, the consequences of inadequate cleansing suggest that efficacy should be a higher priority than tolerability. Consequently, the choice of a bowel cleansing regimen should be based on cleansing efficacy first and patient tolerability second. However, efficacy and tolerability are closely interrelated. For example, a cleansing agent that is poorly tolerated and thus not fully ingested may not achieve an adequate cleansing.

The goals of this consensus document are to provide expert, evidence-based recommendations for clinicians to optimize colonoscopy preparation quality and patient safety. Recommendations are

provided using the Grades of Recommendation Assessment, Development and Evaluation (GRADE) scoring system, which weighs the strength of the recommendation and the quality of the evidence (8).

### METHODS

#### Search Strategy

Computerized medical literature searches were conducted from January 1980 (first year of approval of polyethylene glycol-electrolyte lavage solution [PEG-ELS]-based preparation by the Food and Drug Administration [FDA]) up to August 2013 using MEDLINE, PubMed EMBASE, Scopus, CENTRAL, and ISI Web of Knowledge. We used a highly sensitive search strategy to identify reports of randomized controlled trials (9) with a combination of medical subject headings adapted to each database and text words related to colonoscopy and gastrointestinal agents, bowel preparation, generic name, and brand name. The complete search terms are available in Appendix A. Recursive searches and cross-referencing also were performed using a “similar articles” function; hand searches of articles were identified after an initial search. We included all fully published adult human studies in English or French.

A systematic review of published articles and abstracts presented at national meetings was performed to collect and select the evidence. A meta-analysis and consensus agreement were used to analyze the evidence. Expert consensus was used to formulate the recommendations. The GRADE system was used to rate the strength of the recommendations. The guideline was reviewed by committees of and approved by the governing boards of the member societies of the Multi-Society Task Force on Colorectal Cancer (American College of Gastroenterology, American Gastroenterological Association, and American Society of Gastrointestinal Endoscopy).

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**FARNCOMBE**  
Farncombe Family Digestive Health Research Institute

Johnson DA et al. AJG 2014; 109: 1528-45

McMaster  
University



# 4 liter versus 2 liter PEG

- High volume ( $\geq 3$  l) vs. low volume ( $< 3$  l)
- 28 trials
- 7208 ITT patients
- No difference in bowel cleanliness
- OR = 1.03 (95% CI = 0.80 to 1.32)

# PEG versus sodium picosulfate

- Sodium picosulfate versus PEG solutions
- 11 trials
- 3097 ITT patients
- No difference in bowel cleansing
- OR = 0.92 (95% CI = 0.63 to 1.36)

# Oral sulfate solution versus PEG

- Oral sulfate solutions versus PEG
- 2 trials (different PEG regimens)
- 923 ITT patients
- No difference
- OR = 1.12 (95% CI = 0.77 to 1.62)

# Split dose versus day before

- PEG solutions
  - 8 trials, 1990 ITT patients
  - Split improved cleanliness
  - OR = 4.38; 95% CI = 1.88 to 10.21
- Sodium picolsulfate
  - One trial, 250 ITT patients
  - Split dose improved cleanliness
  - OR 3.54; 95% CI = 1.95 to 6.45

# Split dose versus same day

- No RCTs
- One RCT same day 4 l PEG versus day before
- 136 patients
- Same day superior
- OR = 2.63 (1.31 to 5.27)

# Summary of what the evidence tells us

- Can be reasonably confident
  - 4 l PEG, 2 l PEG, sodium picosulfate similar efficacy
  - Split dose better than previous day preparations (PEG)
- Need more data to be confident
  - Oral sulfate solution
  - Same day preparations for afternoon colonoscopy

# Evidence Based Medicine







Gordon Guyatt

“Evidence based Medicine” ACP Journal Club 1991

# GRADE

- Grades the quality of evidence
- Gives a strength of recommendation
- Systematic transparent approach
- Developed by a Working Group since 2000
- Endorsed by over 90 organizations worldwide

# 60+ Organizations



# Quality of the evidence



- High
  - further research unlikely to change effect estimate
- Moderate
  - more research likely to change effect estimate
- Low
  - more research very likely to change effect estimate
- Very low
  - Any effect estimate very uncertain

# Strength of recommendation

- Strong recommendation
  - Applies to most patients most of the time
- Weak recommendation
  - Applies only to some patients





# FDA-APPROVED PREPARATIONS

## Recommendations

1. Selection of a bowel-cleansing regimen should take into consideration the patient's medical history, medications, and, when available, the adequacy of bowel preparation reported from prior colonoscopies (*Strong recommendation, moderate-quality evidence*).
2. A split-dose regimen of 4L PEG-ELS provides high-quality bowel cleansing (*Strong recommendation, high-quality evidence*).
3. In healthy nonconstipated individuals, a 4-L PEG-ELS formulation produces a bowel-cleansing quality that is not superior to a lower-volume PEG formulation (*Strong recommendation, high-quality evidence*).



**FARNCOMBE**

Farncombe Family Digestive Health Research Institute

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McMaster  
University



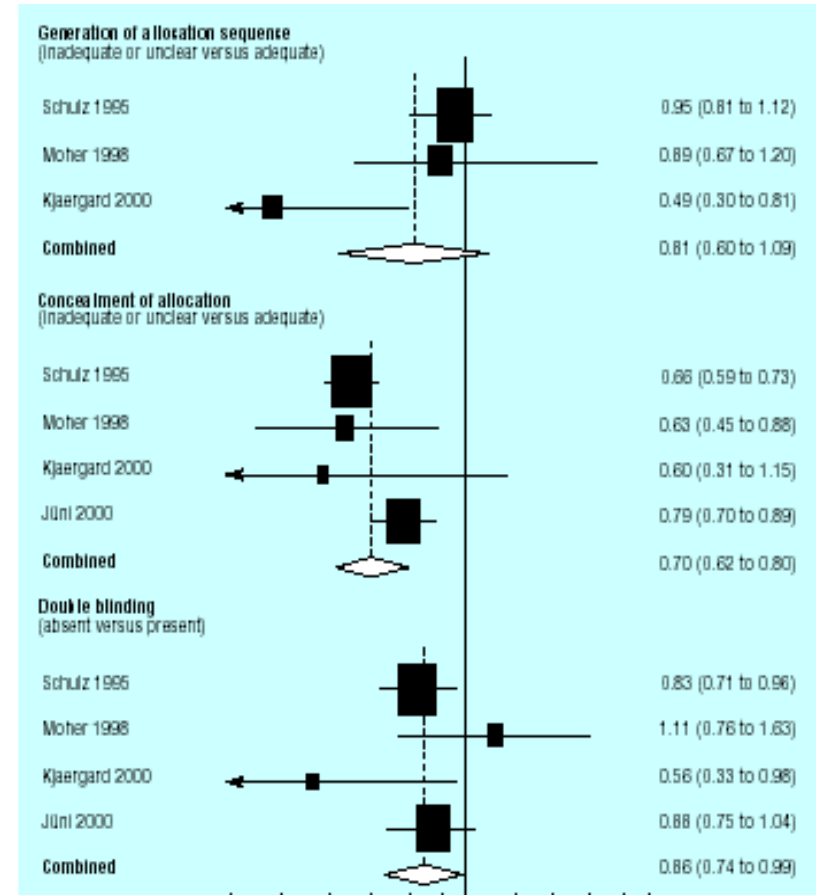
# Confidence assessment criteria (quality of the evidence)

Study Design	Confidence in estimates	Lower if	Higher if
Randomised trial →	High	<p><b>Risk of bias</b></p> <p>-1 Serious -2 Very serious</p>	<p>Large effect +1 Large +2 Very large</p>
	Moderate	<p>Inconsistency -1 Serious -2 Very serious</p>	<p>Dose response +1 Evidence of a gradient</p>
Observational study →	Low	<p>Indirectness -1 Serious -2 Very serious</p>	<p>All plausible confounding +1 Would reduce a demonstrated effect or</p>
	Very low	<p>Imprecision -1 Serious -2 Very serious</p> <p>Publication bias -1 Likely -2 Very likely</p>	<p>+1 Would suggest a spurious effect when results show no effect</p>



# Individual quality criteria

- Method of randomization
- Concealment of allocation
- Masking



# Confidence in 2L vs 4L PEG data

- 24 trials for 2L vs 4L
- In ALL trials patients were not blinded
- Not the fault of the investigators
- Patients should be unblinded to assess tolerance
- Nevertheless ALL trials are at high risk of bias

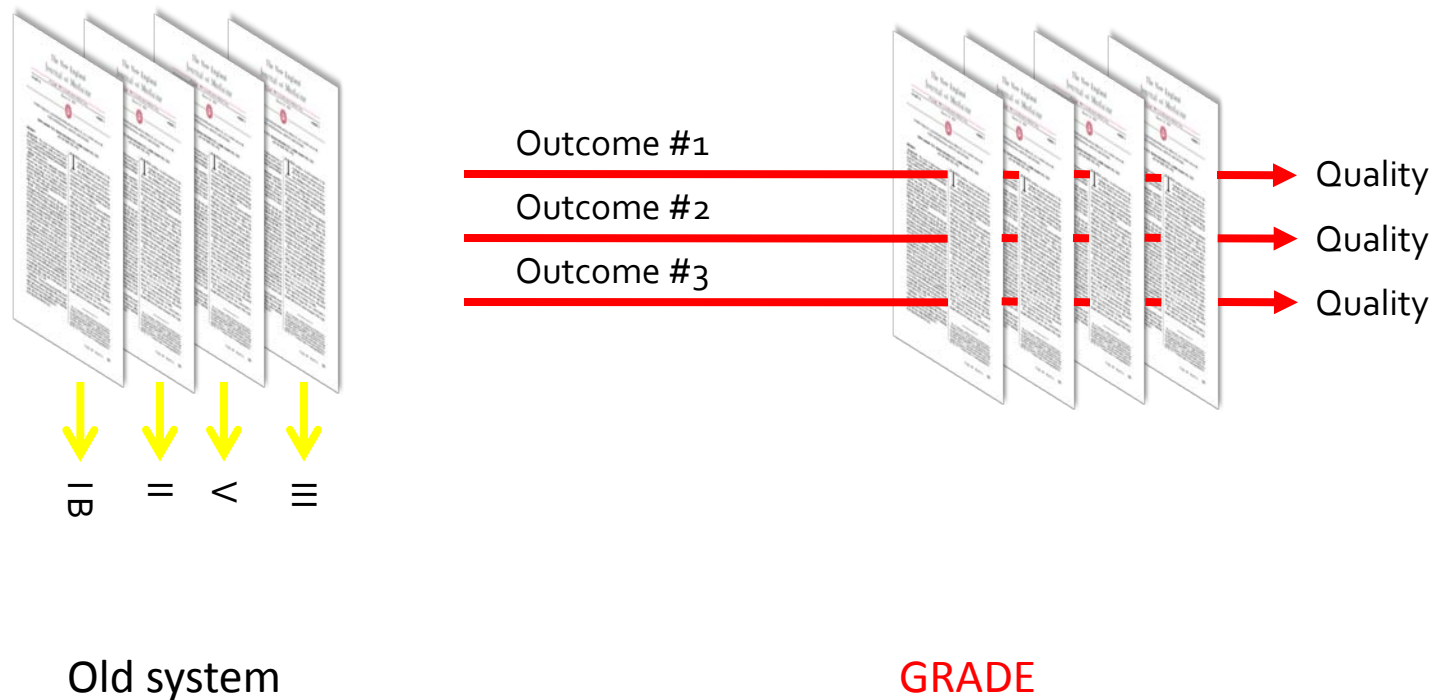
# Quality of 2L vs 4L data

- Only 6/24 (25%) met minimal standards for randomization and concealment of allocation
- 0/24 met highest standards for randomization and concealment of allocation

# Confidence assessment criteria (quality of the evidence)

Study Design	Confidence in estimates	Lower if	Higher if
Randomised trial →	High	<div>Risk of bias</div> <div>-1 Serious</div> <div>-2 Very serious</div>	<div>Large effect</div> <div>+1 Large</div> <div>+2 Very large</div>
	Moderate	<div>Inconsistency</div> <div>-1 Serious</div> <div>-2 Very serious</div>	<div>Dose response</div> <div>+1 Evidence of a gradient</div>
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		<div>Publication bias</div> <div>-1 Likely</div> <div>-2 Very likely</div>	

# A grading system needs to be outcome-centric



Formulate question

Select outcomes

Rate importance

Outcomes across studies

Create evidence profile with GRADEpro

Rate quality of evidence for each outcome

RCT start high, obs. data start low

P  
I  
C  
O

Outcome Critical

Outcome Critical

Outcome Important

Outcome Less important



Summary of findings & estimate of effect for each outcome									
Outcome	Study	Relative risk	95% CI	Quality	Study	Relative risk	95% CI	Quality	Study
Outcome 1	Study 1	1.0	0.5-2.0	High	Study 2	1.0	0.5-2.0	High	Study 3
Outcome 2	Study 1	1.0	0.5-2.0	High	Study 2	1.0	0.5-2.0	High	Study 3
Outcome 3	Study 1	1.0	0.5-2.0	High	Study 2	1.0	0.5-2.0	High	Study 3
Outcome 4	Study 1	1.0	0.5-2.0	High	Study 2	1.0	0.5-2.0	High	Study 3

High  
Moderate  
Low  
Very low

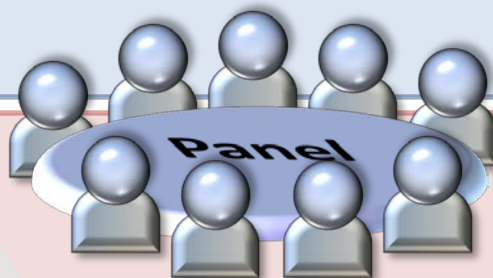
Grade down

1. Risk of bias
2. Inconsistency
3. Indirectness
4. Imprecision
5. Publication bias

Grade up

1. Large effect
2. Dose response
3. Confounders

Summary of findings & estimate of effect for each outcome



Systematic review

Guideline development

- For or against (direction)
- Strong or weak (strength)

By considering:

- ☐ Quality of evidence
- ☐ Balance benefits/harms
- ☐ Values and preferences



Revise if necessary by considering:

- ☐ Resource use (cost)



Rate  
**overall quality of evidence**  
across outcomes based on lowest  
quality  
of **critical** outcomes

- "We recommend using..."
- "We suggest using..."
- "We recommend against using..."
- "We suggest against using..."

# Patient perspective critical

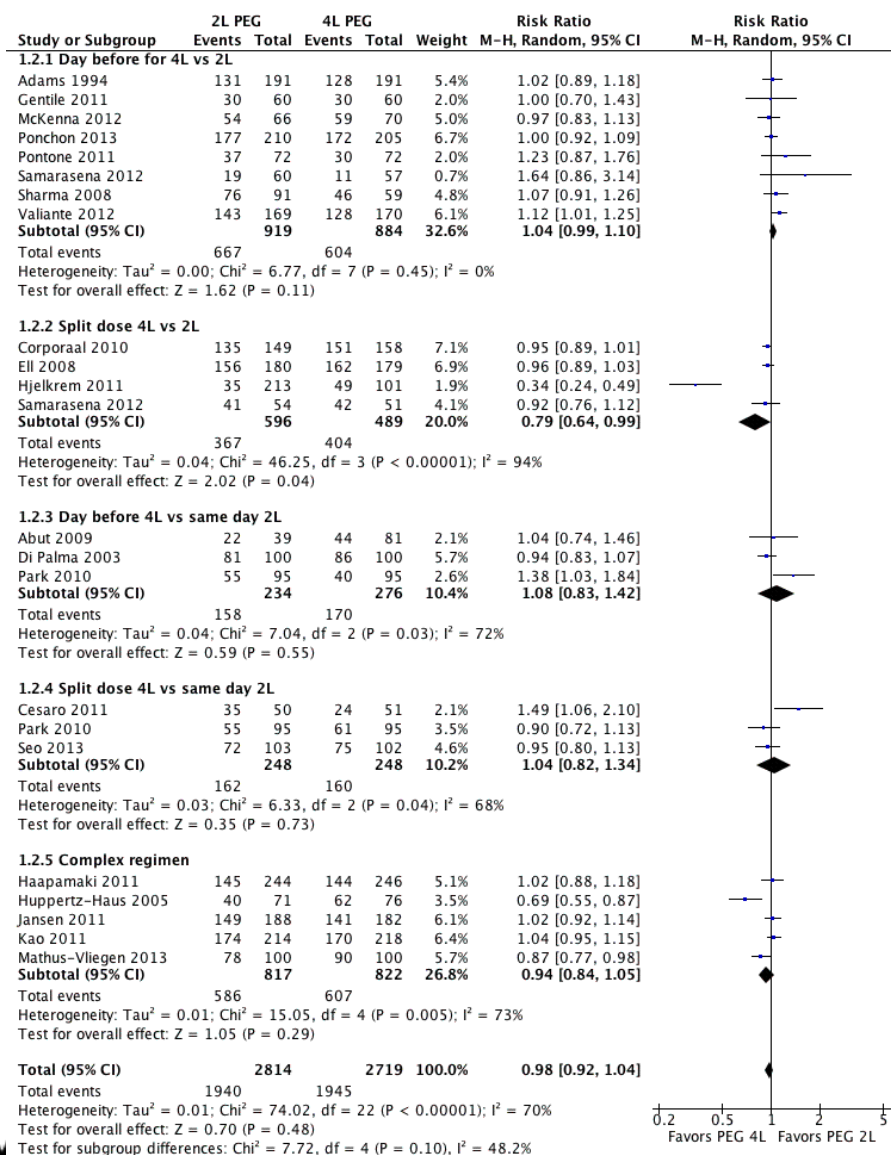
- Clinician perspective
  - Bowel cleanliness
- Patient perspective
  - Reduce cancer risk > high risk ADR > ADR
  - Tolerable
  - Safe

# Trials of 4L vs. 2L PEG

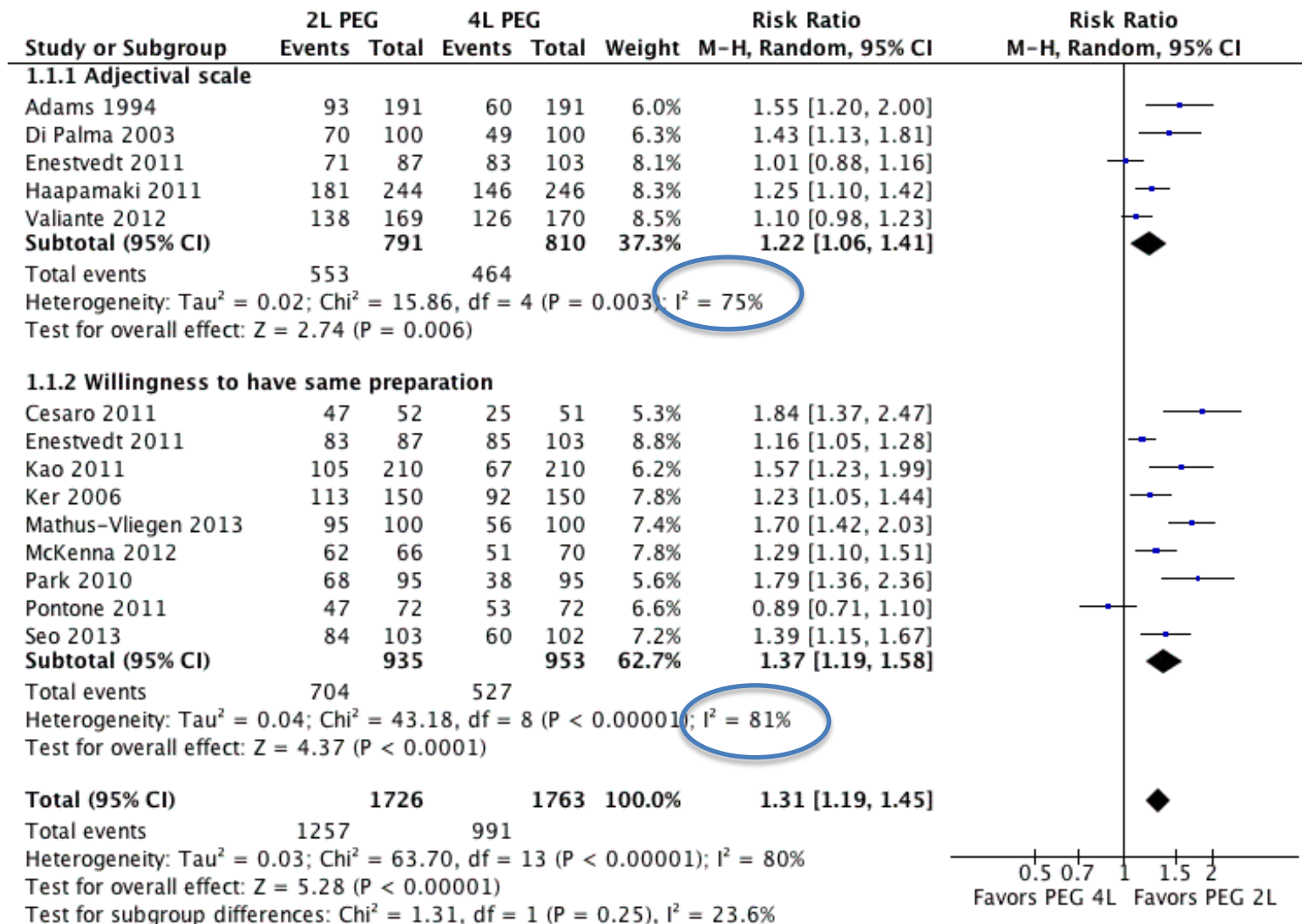
Outcome	No. trials	No. patients	No. validated
Bowel cleanliness	23	5533	14 (61%)
Tolerability	13	3299	0
Safety (electrolyte)	6	1325	N/A
Polyp detection	5	987	N/A



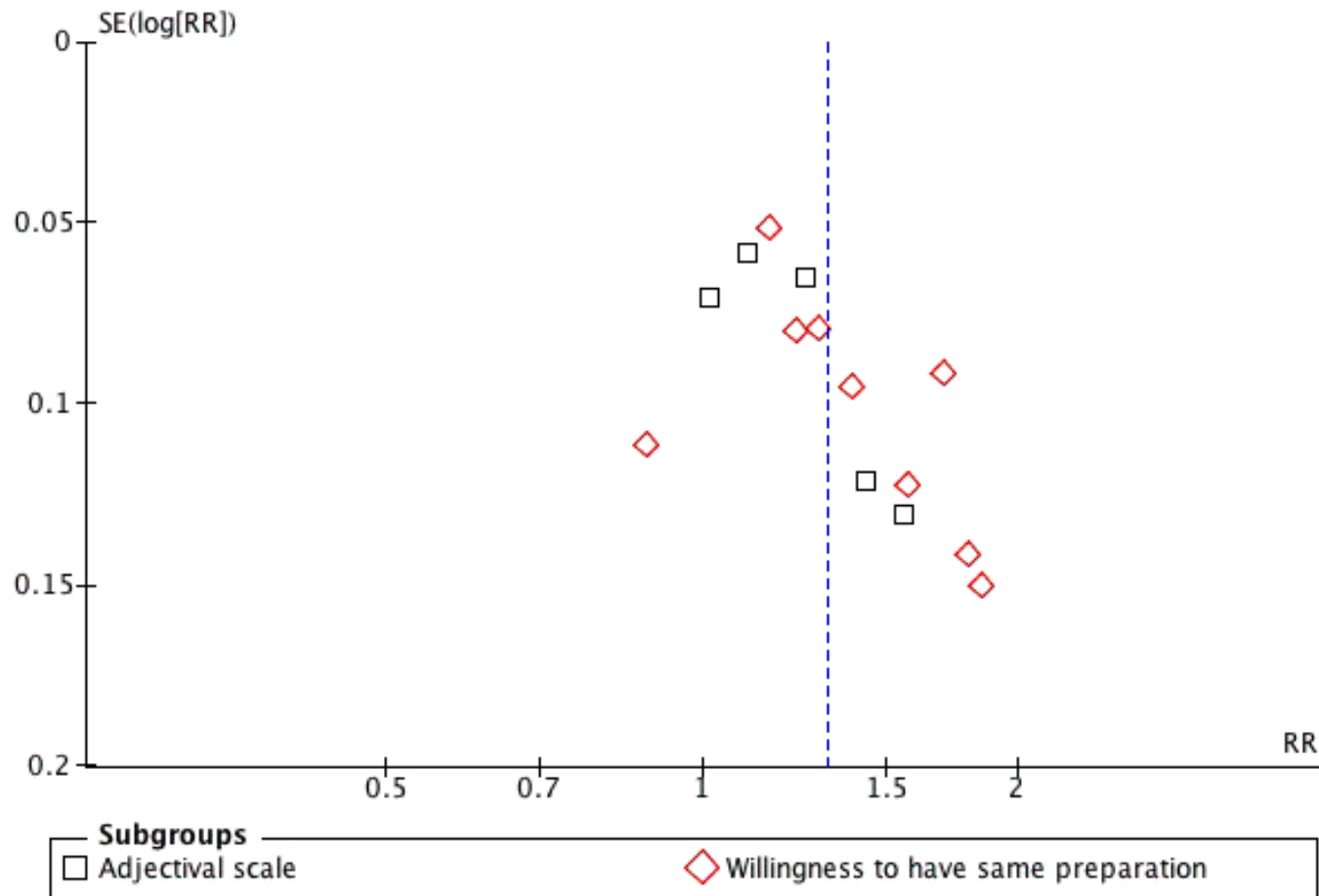
# Bowel cleanliness



# Tolerability



# Funnel plot of tolerability trials



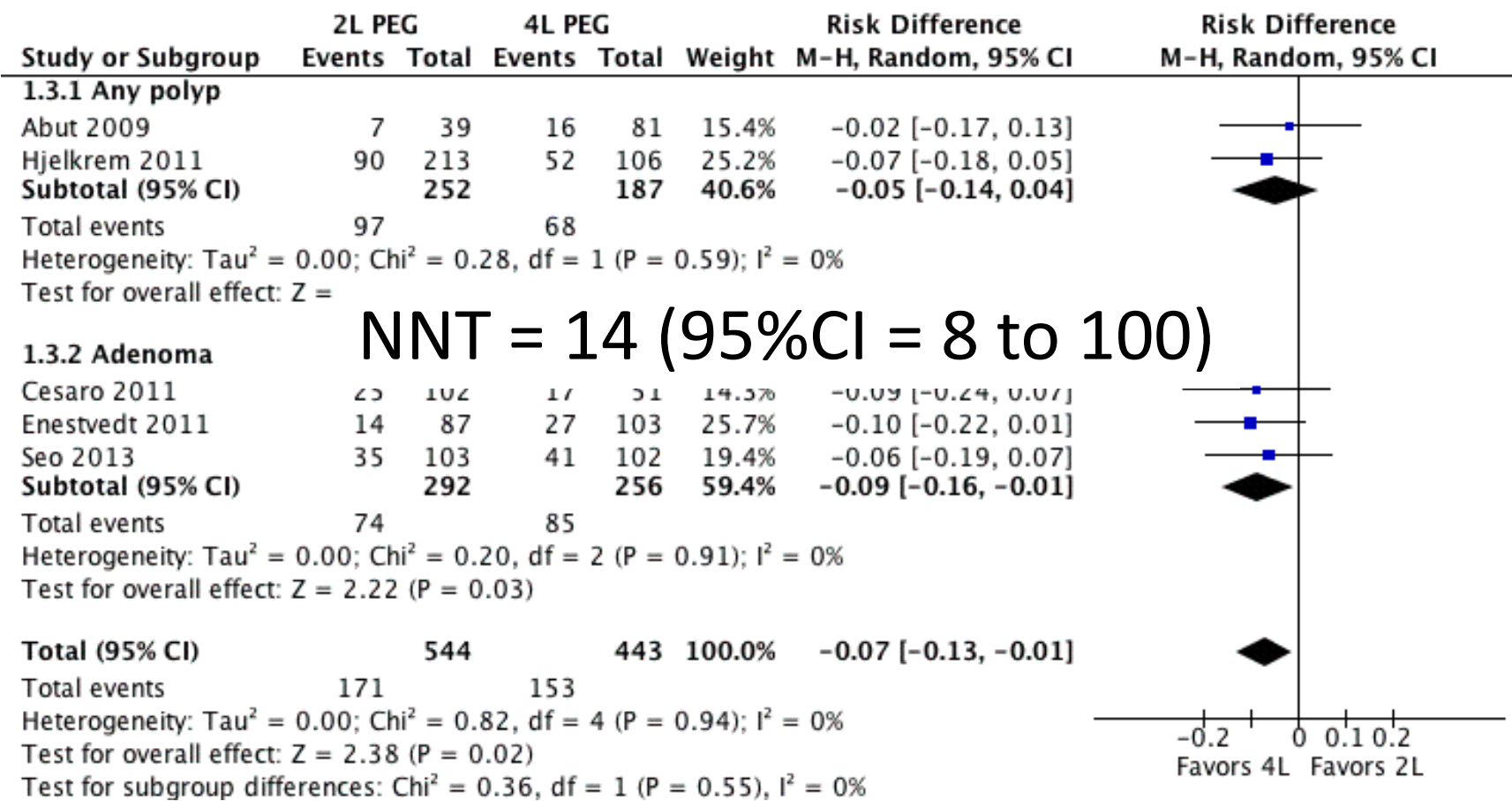
Egger test –  $p = 0.02$

# Confidence assessment criteria

## Tolerability of 2L vs. 4L

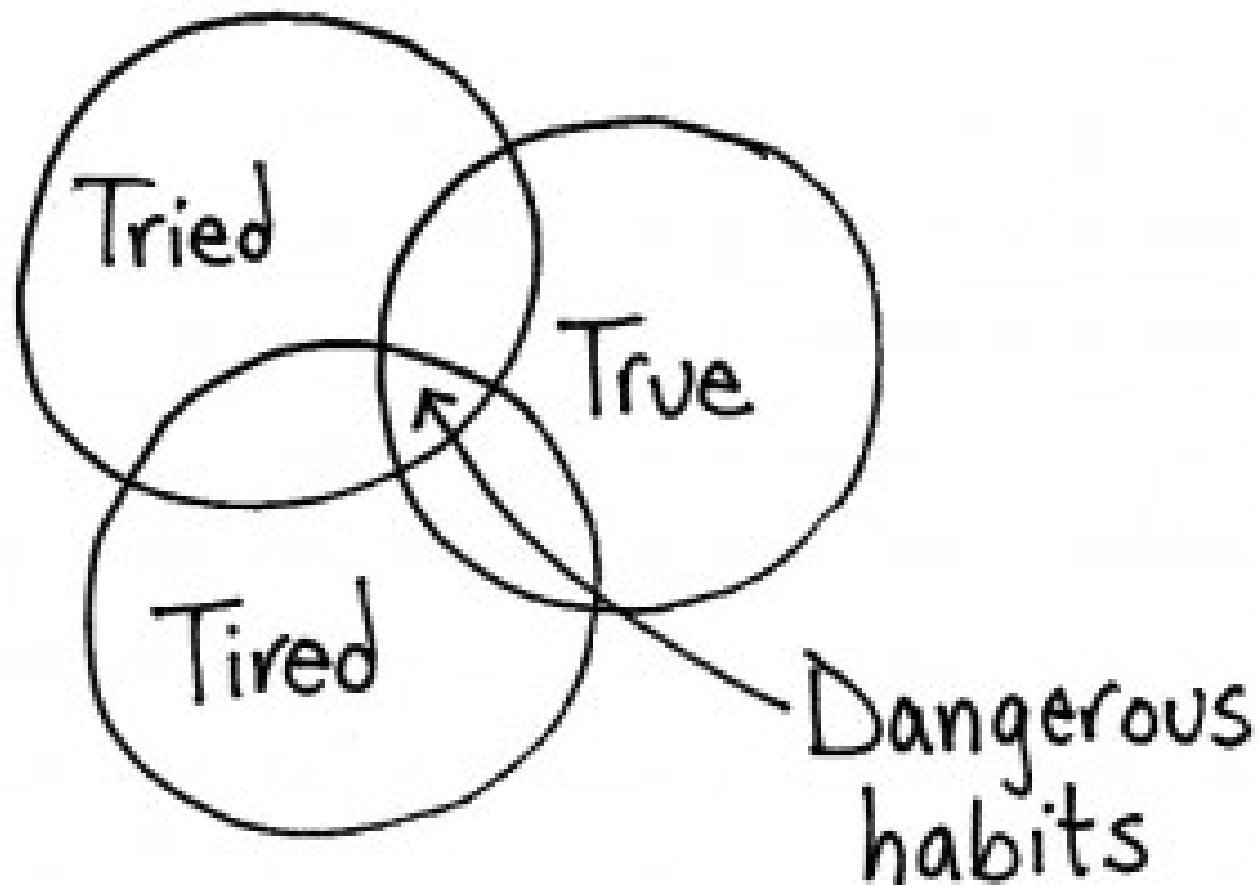
Study Design	Confidence in estimates	Lower if	Higher if
Randomised trial →	High	<div>Risk of bias</div> <div>-1 Serious</div> <div>-2 Very serious</div>	<div>Large effect</div> <div>+1 Large</div> <div>+2 Very large</div>
	Moderate	<div>Inconsistency</div> <div>-1 Serious</div> <div>-2 Very serious</div>	<div>Dose response</div> <div>+1 Evidence of a gradient</div>
Observational study →	Low	<div>Indirectness</div> <div>-1 Serious</div> <div>-2 Very serious</div>	<div>All plausible confounding</div> <div>+1 Would reduce a demonstrated effect or</div>
	Very low	<div>Imprecision</div> <div>-1 Serious</div> <div>-2 Very serious</div> <div>Publication bias</div> <div>-1 Likely</div> <div>-2 Very likely</div>	<div>+1 Would suggest a spurious effect when results show no effect</div>

# Polyp detection rates: 2L vs. 4L PEG



# Conclusions

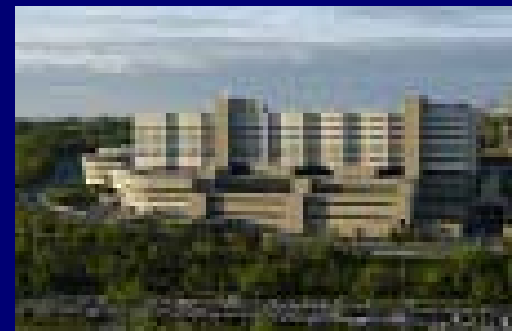
- Use PEG or sodium picosalix
- Data on oral sulfate solution modest
- Split dose preparations (especially PEG)
- End points to date have been clinician focused
- More effort in making end points patient focused
- More rigorous appraisal of confidence in the estimate of effect.





# Safety Issues Surrounding Over-the-Counter and Prescription Bowel Preparations

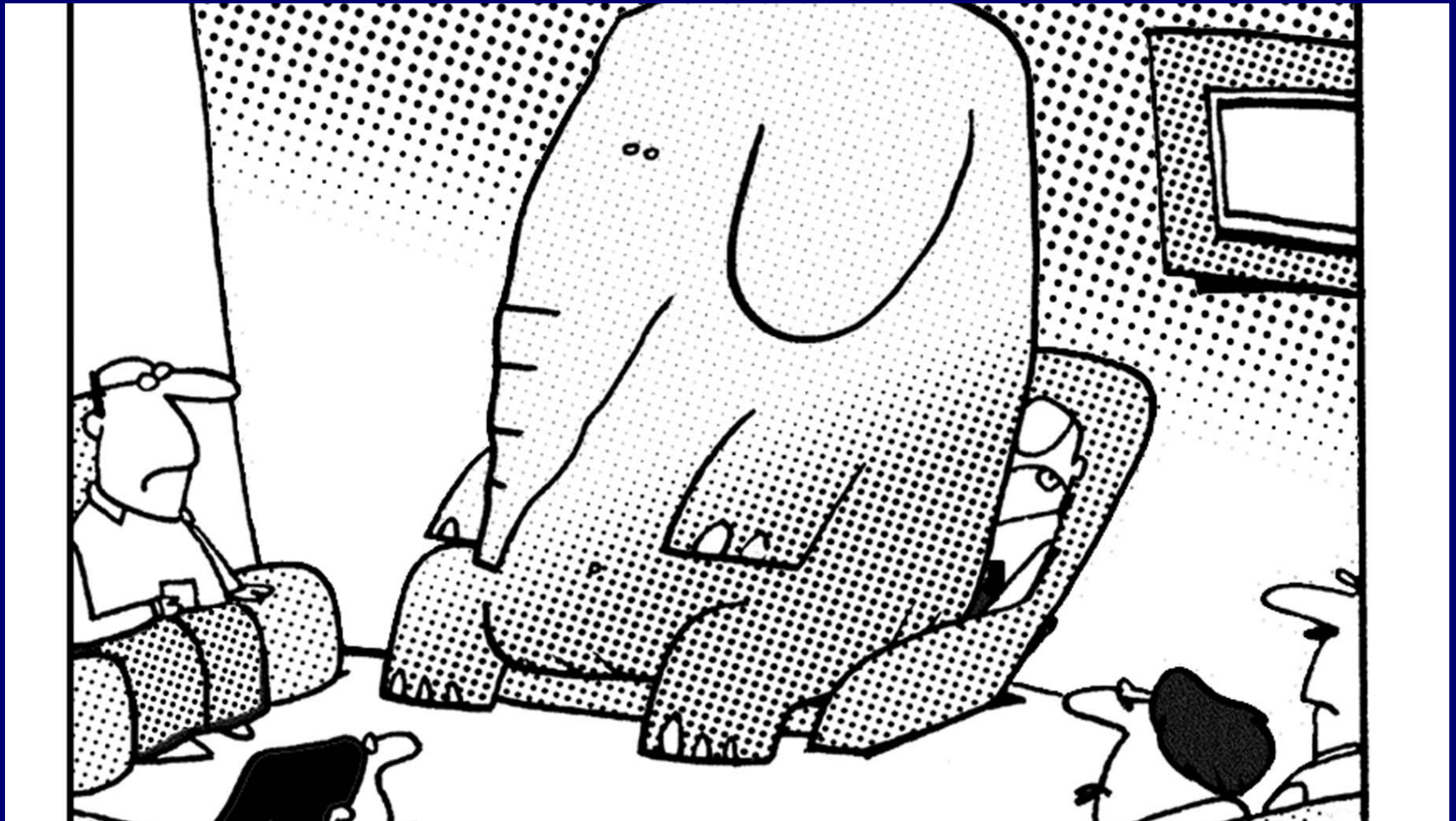
**Philip Schoenfeld, MD, MEd, MSc (Epi)**  
**Professor of Medicine**  
**Director, Training Program in GI Epidemiology**  
**U. of Michigan School of Medicine**





# Disclosures

- Consultant, Advisory Board Member and Speaker's Bureau: Salix Pharmaceuticals, Ironwood Pharmaceuticals, Forest Laboratories
- Partner, EBMed, LLC,



... only Alan was prepared to acknowledge the elephant in the room..

# Miralax – Gatorade Bowel Prep



**238 gram  
Bottle of MiraLAX**



**64 oz.  
Bottle of Gatorade**

**plus 10-20mg bisacodyl**

# **Advantages of Miralax-Gatorade**

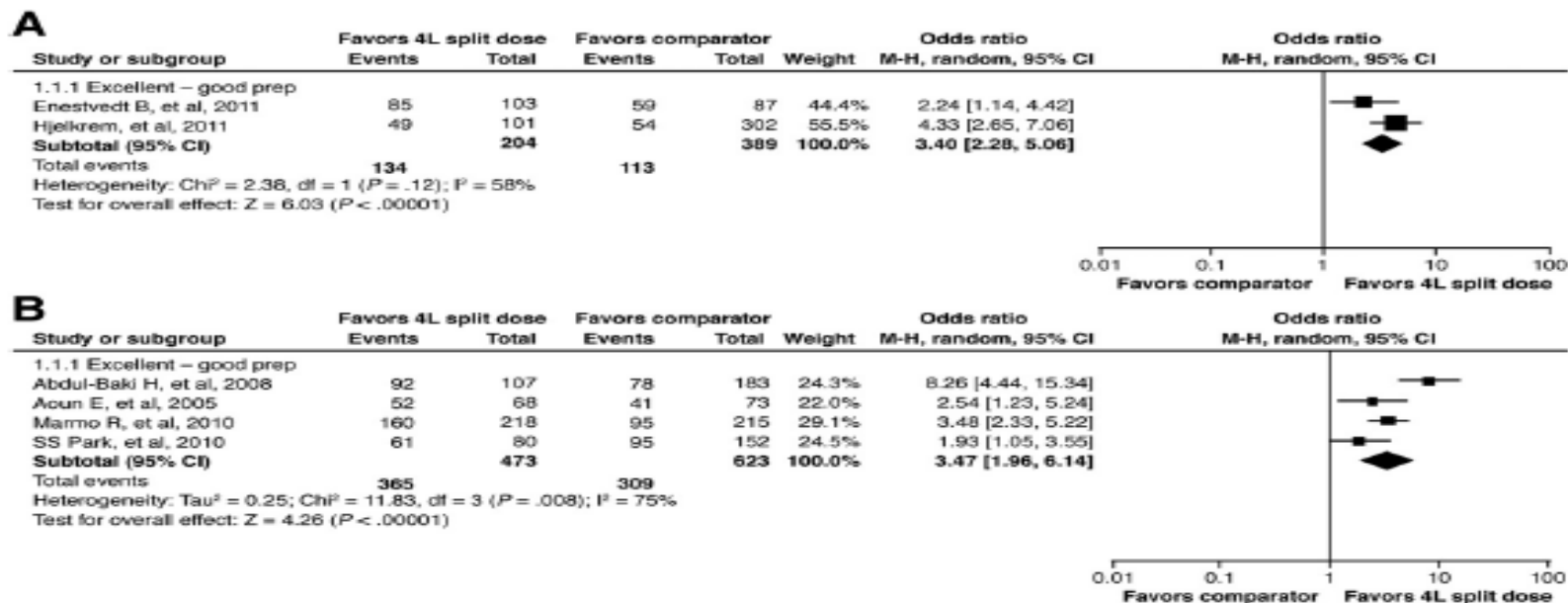
- **Low volume**
- **Palatable**
- **Inexpensive**

**... may lead to improved compliance  
with bowel preparation regimen?**

# Increasing Popularity of Miralax-Gatorade Combination

- Survey of random sample of ACG members in US in **2010-11**
- Asked about use of split-dose, liberal diet (low residue on day before procedure), and use of Miralax-based preparations.
- 30% of sample responded to survey (288/999)
- 60% (170/283) used split-dose
- **37% (106/283) used miralax-based preps. Among these physicians, 82% (87/106) combined it with gatorade. Data based on survey from 2010-11.**

# Miralax-Gatorade Bowel Preparation



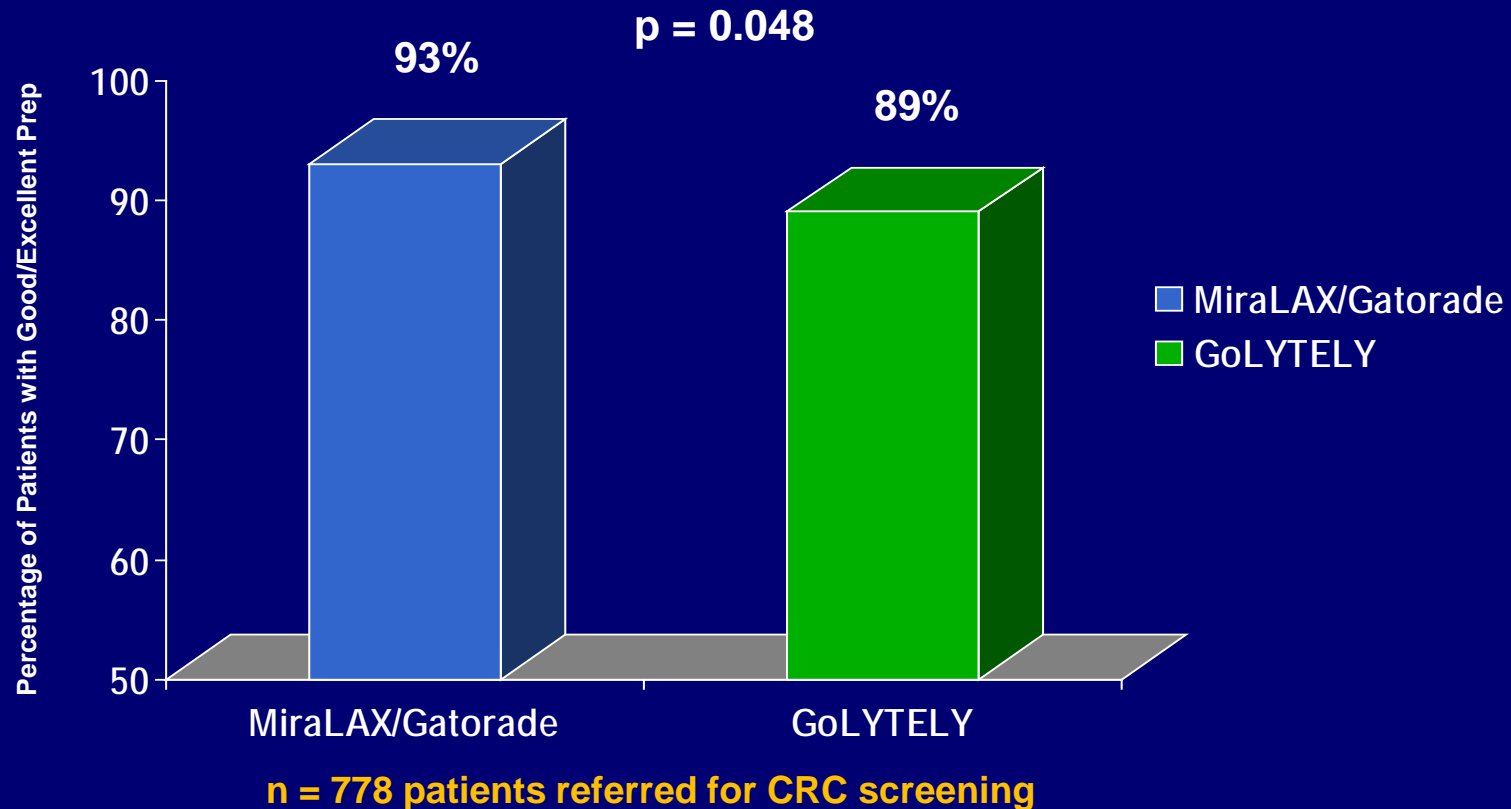
**Figure 3.** Post hoc subgroup meta-analyses showing a higher number of excellent or good bowel preparations with 4-L split-dose PEG than for (A) Miralax/Gatorade or (B) single-dose 4-L PEG preparations. (A) A 4-L split-dose PEG vs Miralax/Gatorade. (B) A 4-L split-dose PEG vs single-dose PEG.

**OR = 3.40 (2.28-5.06) for Excellent/Good Bowel Cleansing with split-dose 4l Golytely vs split-dose MiraLax-Gatorade**

**this is the same as OR for getting Excellent/Good Bowel Cleansing with 4l of Golytely split-dose vs 4l Golytely as pm single dose (OR =3.47; 1.96-6.14)**

For Enestvedt RCT, rate of excellent or good prep by Boston Bowel Prep Score was 83% (85/103) vs 68% (59/87)

# Retrospective Endoscopic Database Analysis: PEG-3350 + Gatorade + Bisacodyl vs. 4-L GoLYTELY



Shieh F, Schoenfeld P, et al. *Gastrointest Endosc* 2008; W1543.

Shieh F, Schoenfeld P, et al. *J Clin Gastroenterol* 2012; 46: e96-e100

# Similarities between Miralax-Gatorade & Fleets Phospho-Soda

- Low volume
- Palatable
- No prescription needed\*

*\*Cost for M-G plus dulcolax and 4L generic PEG is quite similar at approximately \$15 for both.*



# Similarities between Miralax-Gatorade & Fleets Phospho-Soda

- Low volume
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- Hyperosmolar
- Not FDA approved
- Minimal safety data

*\*Cost for M-G plus dulcolax and 4L generic PEG is quite similar at approximately \$15 for both.*

# Similarities between Miralax-Gatorade & Fleets Phospho-Soda

- Low volume
- Palatable
- No prescription needed

- Hyperosmolar
- Not FDA approved
- Minimal safety data

- *Commonly used at 14X approved FDA-dose (for constipation) when used as bowel preparation*

# Electrolytes in Sports Drinks May Be Insufficient

Although sports drinks can aid in rehydrating and replacing electrolytes lost during sweating as a result of physical exertion, the electrolyte load may be insufficient for patients undergoing a purgative regimen for colonoscopy

	Sports drink, g/2 L*	PEG + ELS, g/2 L	Ratio (PEG + ELS:Sports drink)
Sodium	0.88	8.35	9:1
Potassium	0.24	1.06	4:1
Chloride	0.72	4.23	6:1

**PEG + ELS = polyethylene glycol electrolyte lavage solution.**

**\*Traditional Gatorade®.**

**Cohen et al. *Gastroenterol Hepatol*. 2009;5(11; suppl 20):1-11.**

## Severe Hyponatremia and Seizure Following a Polyethylene Glycol-based Bowel Preparation for Colonoscopy

### To the Editor:

Instances of hyponatremia, seizure, and even death associated with both sodium phosphate and polyethylene glycol oral colonoscopy preparation solutions have been reported to the Food and Drug Administration, but no causative explanations were given.<sup>1,2</sup> Only 3 detailed case reports of hyponatremia due to bowel cleansing have been published, but none of the subjects who developed a seizure had used polyethylene glycol, which is believed to affect serum electrolytes minimally.<sup>3-5</sup> We report the case of an elderly woman who developed severe hyponatremia resulting in a generalized tonic-clonic seizure shortly after a polyethylene glycol-based bowel cleansing for colonoscopy. We wish to emphasize multiple contributing factors, some of which may be avoidable.

S.M., a 73-year-old woman, ingested 64 ounces of Gatorade into which she mixed 255 g of polyethylene glycol 3350 (Miralax) in preparation for a colorectal cancer screening colonoscopy examination. After drinking this mixture, she experienced abdominal discomfort and nausea. She vomited and feeling thirsty afterwards, swallowed 2 glasses of water. She was subsequently brought to our emergency department where her physical examination was normal except for tangential mentation with perseveration. No orthostatic changes were present. Very shortly afterwards, she developed a tonic-clonic seizure which was treated with intravenous lorazepam.

Past medical history was notable for hypothyroidism and depression. Outpatient medications included levothyroxine sodium and citalopram. Laboratory data revealed: serum sodium 117 mmol/L, potassium

3.3 mmol/L, chloride 79 mmol/L, bicarbonate 21 mmol/L, blood urea nitrogen 6 mg/dL, creatinine 0.6 mg/dL, serum osmolality 225, urine osmolality 390, urine sodium 146 mmol/L, and urine potassium 35.7 mmol/L. Her calculated FeNa was 3.8%.

Following an infusion of 1 L of 2% hypertonic saline, her serum sodium rose to 125 mmol/L. She was then placed on 1 L/d fluid restriction. When her serum sodium failed to rise higher, sodium chloride tablets, 1 g every 6 hours, were added. Further evaluation revealed a slightly elevated serum TSH level which was corrected by increasing her daily dose of levothyroxine. Oral sodium supplementation and fluid restriction were discontinued when her serum sodium rose to 131 mmol/L. Two weeks later as an outpatient, serum sodium was 138 mmol/L and her mental status was normal.

Hyponatremia, defined as a serum sodium less than 135 mmol/L, can be caused by salt loss secondary to vomiting, diarrhea or excessive perspiration and renal disease, hypoadrenalism, and hypothyroidism, but is most commonly due to the syndrome of inappropriate antidiuretic hormone release (SIADH). The regulation of free water clearance is dependent upon serum osmolality and is controlled via release of antidiuretic hormone (ADH). However, ADH release can also occur independently of osmolar stimuli in the presence of nausea, anxiety, or pain.<sup>6,7</sup> Age is another contributing factor. A study of 50 hospitalized patients with SIADH revealed that in 60% of cases, no cause for increased ADH other than advanced age ( $77 \pm 8.3$ ) could be identified.<sup>8</sup>

A variety of tumors, pulmonary diseases, and central nervous system disorders can cause an inappropriate release of ADH. Commonly prescribed medications such as thiazide diuretics, nonsteroidal anti-inflammatory drugs, angiotensin converting enzyme inhibitors, and opiate derivatives are capable of raising ADH levels. Antidepressants of the selective serotonin re-uptake inhibitor (SSRI) class have become increasingly popular and may also cause hyponatremia

via SIADH, especially in the elderly. In one study of 15 patients, 40% developed hyponatremia following a 2-week course of treatment with an SSRI.<sup>9</sup> Another study of 116 consecutive cases of hyponatremia in elderly patients (mean age 73) found that 75% of cases were secondary to the use of an SSRI.<sup>10</sup>

For the patient described in this report, her advanced age, the nausea, and cramps which followed her bowel preparation, and her use of an SSRI, may have led to SIADH. The addition of vomiting, pure water ingestion and inadequately treated hypothyroidism were further aggravating factors which ultimately resulted in severe hyponatremia and seizure. We conclude that physicians should become thoroughly familiar with a patient's medical history and current medications before prescribing a bowel cleansing regimen, all patients should be encouraged to keep well hydrated with electrolyte containing solutions both during and after laxative ingestion, and serum electrolytes should be checked if there are any mental aberrations before colonoscopy procedures.

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Hepatology

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Division of Pulmonary Diseases

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### REFERENCES

1. Mackey AC, Schaffer D, Prizant R. Seizure associated with the use of viscol for colonoscopy. *N Engl J Med*. 2002;346:2095.
2. Rose M, Jacob LS. Seizure associated with the use of viscol for colonoscopy. *N Engl J Med*. 2002;347:295-296.
3. Salik JM, Kurtin P. Severe hyponatremia after colonoscopy preparation in a patient with the acquired immune deficiency syndrome. *Am J Gastroenterol*. 1985;80:177-179.
4. Schroppel B, Seeger S, Kenneke C, et al. Hyponatremia encephalopathy after preparation for colonoscopy. *Gastrointest Endosc*. 2001;53:529-530.
5. Fritelle FA, Colls BM. Hyponatremia and seizures after bowel preparation: report of three cases. *Dis Colon Rectum*. 2005;48:393-396.

## First case report of severe hyponatremia with M-G prep

- 73-year-old-woman
- Severe hyponatremia (Na+ = 117 mmol/L)
- Hospitalized after generalized tonic-clonic seizure

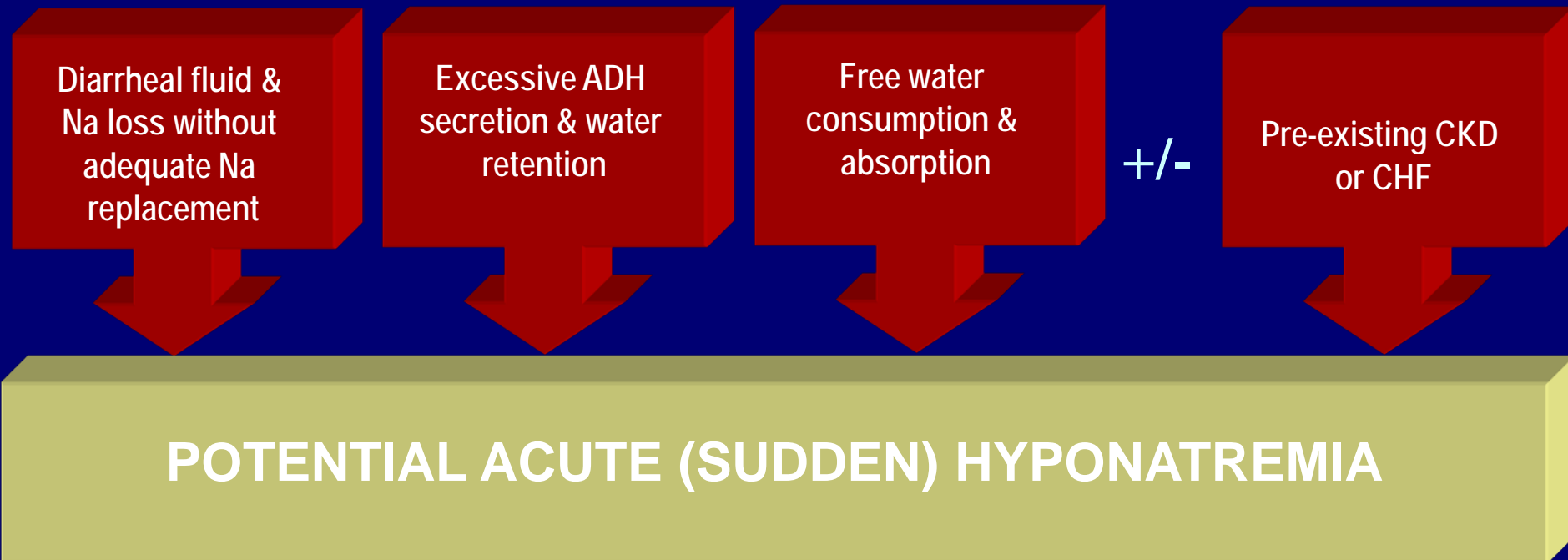
Nagler J et al. *J Clin Gastro*  
2006; 40: 558

\* All purgative products have been associated with hyponatremia and seizure. See full prescribing information for complete details. MiraLAX is a registered trademark of Schering-Plough Healthcare Products, Inc.

**Hyponatremia may develop with any colonoscopy preparation as a result of vomiting, diarrhea, renal disease, or inappropriate secretion of ADH (SIADH)**

# Physiological bases for potential hyponatremia

## OTC PEG-3350 + sports drink prep



# Possible Mechanism: SIADH

## DRUGS

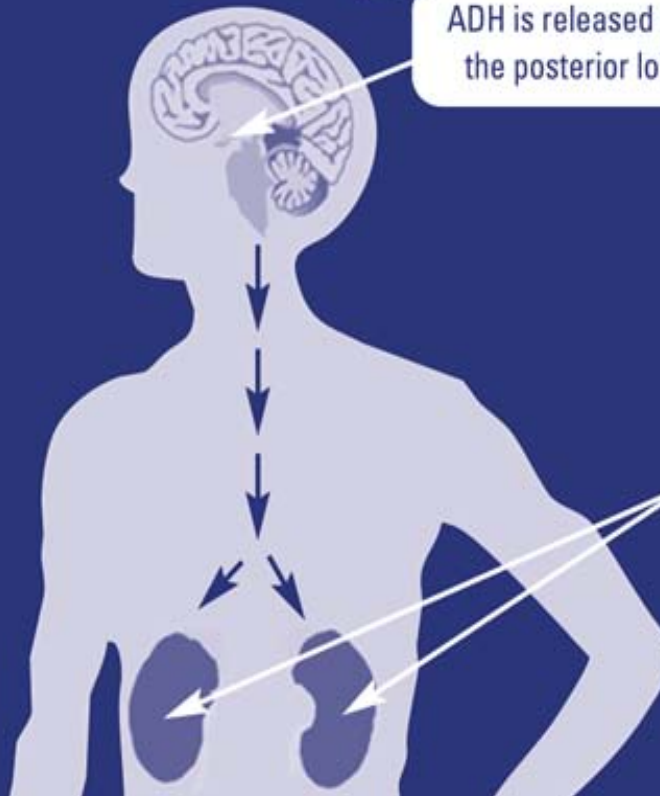
- Thiazide diuretics
- Nonsteroidal anti-inflammatory drugs (NSAIDs)
- Angiotensin converting enzyme inhibitors (ACEs)
- Opiate derivatives
- Selective serotonin re-uptake inhibitors (SSRIs)
- Tricyclic antidepressants
- Antipsychotics

## NAUSEA & VOMITING

## VOLUME DEPLETION

ADH is released into the blood from the posterior lobe of the pituitary

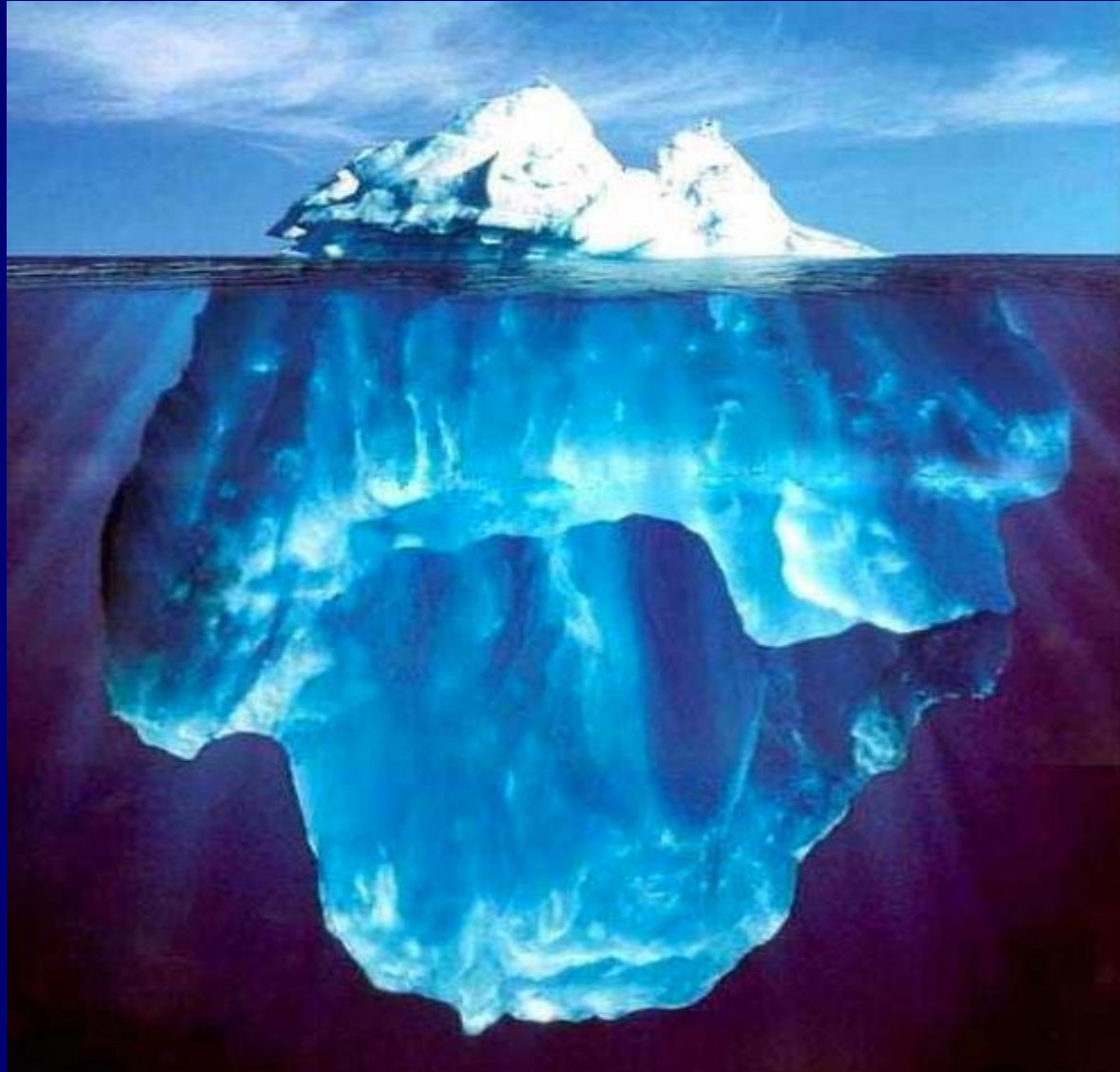
This causes the kidneys to conserve water, which can result in fluid overload and hyponatremia



# **Three Cases of Severe Hyponatremia (< 130 mEq/l) with MiraLAX-Gatorade Use at UM in Summer 2010**



# Three Cases of Severe Hyponatremia (< 130 mEq/l) with MiraLAX-Gatorade Use at UM in Summer 2010



# Methods

- Monitor for new adverse events in currently marketed drugs.
- Voluntary reporting.
- Physician/Nurse/Pharmacist
- Patients

U.S. Department of Health and Human Services

## MEDWATCH

The FDA Safety Information and Adverse Event Reporting Program

For VOLUNTARY reporting of adverse events, product problems and product use errors

General Instructions Page 1 of 1

A. PATIENT INFORMATION				Section A - Help	
1. Patient Identifier   In confidence	2. Age at Time of Event or Date of Birth:  	3. Sex  <input type="checkbox"/> Female  <input type="checkbox"/> Male	4. Weight  lb or kg	2. Dose or Amount #1 #2	
B. ADVERSE EVENT, PRODUCT PROBLEM OR ERROR				Section B - Help	
Check all that apply:					
1. <input type="checkbox"/> Adverse Event <input type="checkbox"/> Product Problem (e.g., defects/malfunctions) <input type="checkbox"/> Product Use Error <input type="checkbox"/> Problem with Different Manufacturer of Same Medicine				3. Dates of Use (If unknown, or best estimate) #1 #2	
2. Outcomes Attributed to Adverse Event (Check all that apply)  <input type="checkbox"/> Death: (mm/dd/yyyy) <input type="checkbox"/> Disability or Permanent Damage <input type="checkbox"/> Life-threatening <input type="checkbox"/> Congenital Anomaly/Birth Defect <input type="checkbox"/> Hospitalization - initial or prolonged <input type="checkbox"/> Other Serious (Important Medical Events) <input type="checkbox"/> Required Intervention to Prevent Permanent Impairment/Damage (Devices)				4. Diagnosis #1 Please type #2	
				6. Lot # #1	

# Results

- **\*\*14 identified cases by May 15 2011**
- **All outpatient colonoscopies**
- **Age: range 35-76 y/o**
- **Gender: 12:2 - Female: Male ratio**
- **No sig PMHx = 6; Htn = 3; Hypothyroid = 2, No Data = 3**
- **Symptomatic Presentation: Nausea, Vomiting, Syncope**
- **29% (4/14) hospitalized in ICU setting**
- **Lowest reported Na (range): 117 – 128 mEQ/mL**

# ... but it isn't all bad news

- RCT of pm only M-G (n=66) vs 2L PEG-ELS (MoviPrep ®) (n=70) with serum electrolytes on day of colonoscopy<sup>1</sup>
  - Serum Na<sup>+</sup>: 138.8(+/- 2.4) mmol/L vs 139.3 (+/- 2.4) mmol/L; p =0.13
- RCT of 222 patients randomized to split dose M-G (n = 54); pm only M-G (n = 60); split-dose 4L GoLytely (n=51); pm only 4L GoLytely (n = 57)<sup>2</sup>
  - Serum electrolytes obtained before start of bowel preparation & before colonoscopy.
  - No significant differences in mean change in electrolytes from baseline in any group. Range of change in sodium: -0.37 (pm only M-G) to +0.02 (pm only GoLyely)
- RCT of 389 patients randomized to split dose M-G (n=180) vs split dose PEG-ELS (MoviPrep®) (n= 184)<sup>3</sup>
  - Serum electrolytes obtained before start of bowel preparation & before colonoscopy.
  - Hyponatremia: M-G = 3.9% (7/180) vs PEG-ELS 2.2% (4/184); OR = 1.8; 0.5-8.6; p=0.38)

1. McKenna T, et al. Dig Dis Sci 2012; 57: 3098-3105

2. Samarsena J, et al. Am J Gastroenterol 2012; 107: 1036-42.

3. Matro R, Kastenberg D, et al. Aliment Pharmacol Ther 2014; 40: 610-19

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  - Serum electrolytes obtained before start of bowel preparation & before colonoscopy.
  - Incidence of hyponatremia: M-G = 3.9% (7/180) vs PEG-ELS 2.2% (4/184); OR = 1.8; 0.5-8.6; p=0.38)

***...But is this sample size large enough to identify a significant difference in rare serious adverse event?***

1. McKenna T, et al. Dig Dis Sci 2012; 57: 3098-3105
2. Samarsena J, et al. Am J Gastroenterol 2012; 107: 1036-42.
3. Matro R, Kastenber D, et al. Aliment Pharmacol Ther 2014; 40: 610-19

# **Increased Risk of Severe Hyponatremia with Miralax-Gatorade vs Iso-osmolar PEG solution**

- **IRB-approved retrospective database study**
- **Linked UM colonoscopy scheduling records to UM Emergency Dept records**
- **Identified individuals who presented to ED during the 24 hours prior to scheduled colonoscopy.**



# Increased Risk of Severe Hyponatremia with Miralax-Gatorade vs Standard Bowel Preparation

- Among 8413 colonoscopies performed in 2009, 5 patients were hospitalized for severe hyponatremia:

0.13% (3/2304) of M-G pts vs 0.032% (2/6109) of PEG pts

odds ratio = 3.98; 95% CI: 0.66-23.8; p = 0.10.

- All patients presented with a combination of N/V, pre-syncope, mental status changes, or abd pain.

## ... and it isn't just OTC products

- **Prepopik®: sodium picosulfate, mag oxide, & anhydrous citric acid) Hyperosmolar, FDA-approved.**
  - Rex et al. Split-dose Prepopik® superior to pm only Half-lytely® for bowel cleansing. <sup>1,2</sup>
  - Hyponatremia more common with Prepopik®:
    - **3.7%(11/298) vs 1% (3/295)**
    - **OR =3.73 (95% CI: 1.03-13.5;p =0.045)**

***.... But this is asymptomatic hyponatremia! What about clinically important hyponatremia?***

1. Rex D, et al. Gastrointest Endosc 2013; 78: 132-41.

2. Prepopik® Package Insert. Parsipanny, NJ. Ferring Pharmaceuticals, Inc. 2013



# Risk of Hospitalization with Hyponatremia with Prepopak®

- Population-based retrospective cohort study in Canada. Looked for hospitalization with hyponatremia within 30 days of prescription date.
- Risk of hyponatremia higher with sodium picosulfate bowel preparation (10mg sodium picosulfate, 3.5gm mag oxide & 12g citric acid per sachet) vs PEG bowel preparations:
  - *0.09% (93/99,237) vs 0.04% (20/48,595);*
  - *adjusted RR = 2.4 (1.5-3.9);*
  - *absolute risk difference 0.05 (95% CI: 0.04-0.06);*
  - *NNH = 1903(95% CI: 1645-2257)*

# Conclusions

- Hospitalization due to severe hyponatremia has occurred with Miralax-Gatorade Bowel Prep and has been associated with Prepopik®
- Caution should be used in recommending a non-FDA approved prep with limited safety data.
- Possible association between these bowel preps and severe hyponatremia requires confirmation through further research.
- ***Remember: complications have been reported with all bowel preparations. No single bowel preparation is universally safe!***

# **The Clinician and Patient Perspective on Endpoints for Bowel Cleansing Studies**

Douglas K Rex MD, MACG

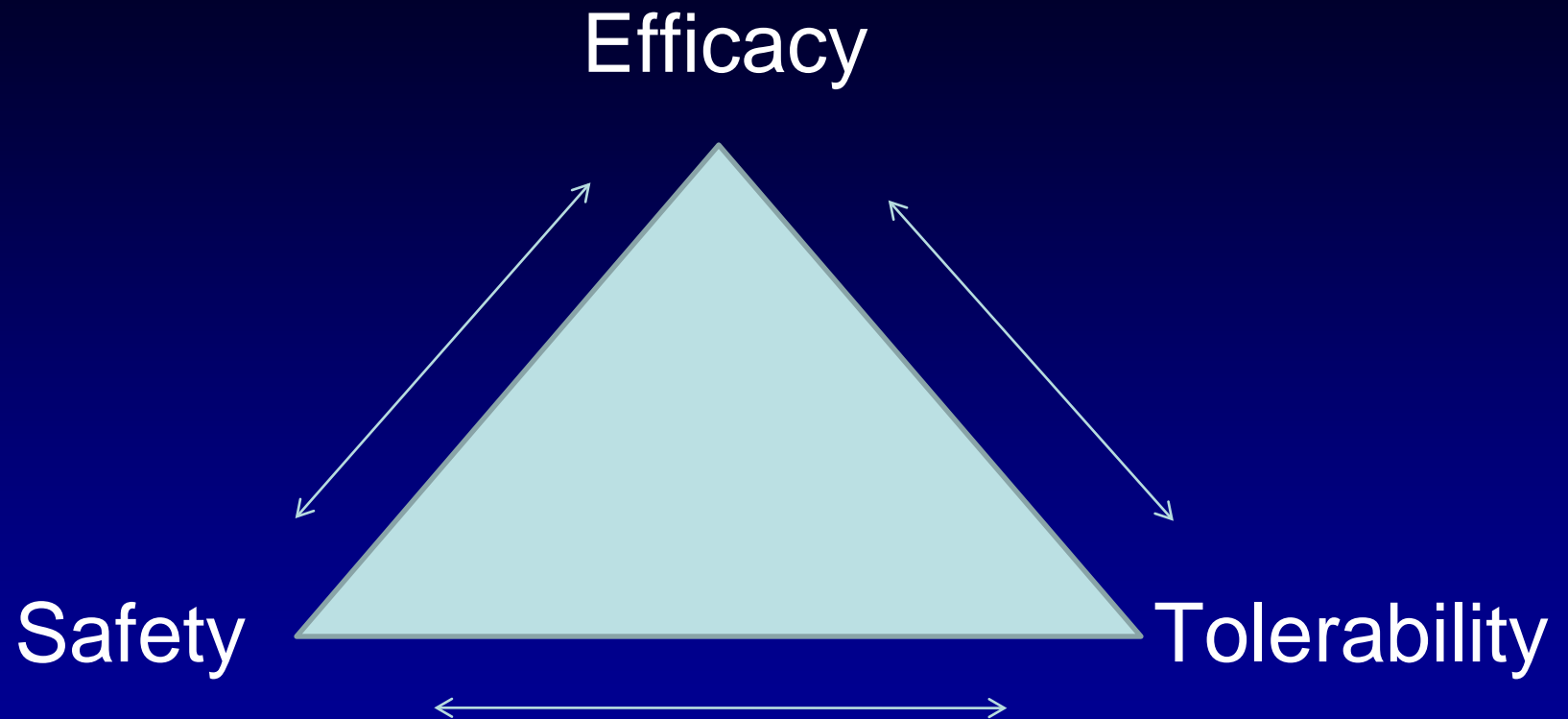
Indiana University Health

Indianapolis, IN

# Disclosures

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- Past consultant to, research support from, and speaker's bureau member for Braintree and Ferring (no current or recent association)
- Braintree sponsors the ASGE colonoscopy “Tip of the Week” – all funding is to the ASGE



# Safety, Efficacy, Tolerability Interaction

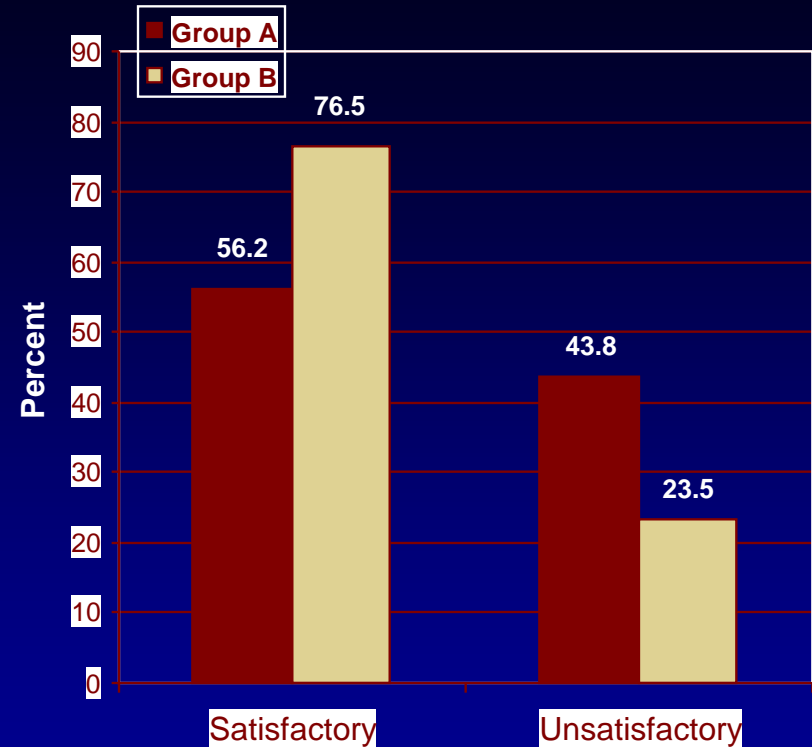
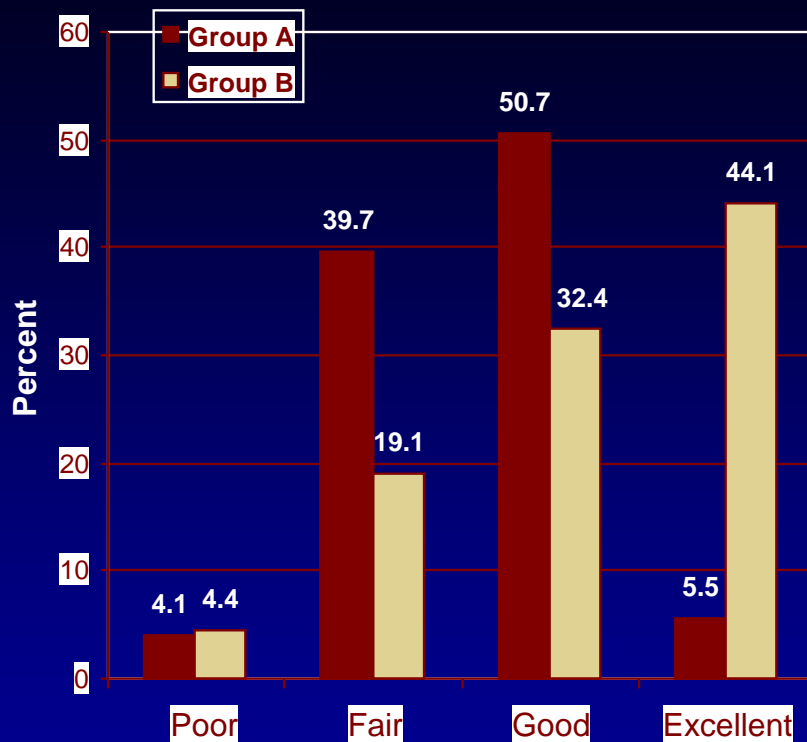
- Safety
  - Safety from direct organ toxicity is a pre-requisite
  - Safety from cancer and from repeated procedures (cost,risk) depends on efficacy
- Efficacy
  - Is the key to the primary purpose (cancer prevention) – it outranks tolerability (informed patients agree with this – and have)
- Tolerability
  - Poor tolerability is unsafe because it reduces willingness to be screened and surveyed

# Bowel preparation science

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- Greatest achievement of the past two decades:
  - Split-dosing adds more to efficacy than any effect of switching from one preparation to another
- Most incorrect conclusion:
  - Non-inferiority equals equivalence

# Split-Dosing Provides More Satisfactory Results Than Traditional Dosing (cont)



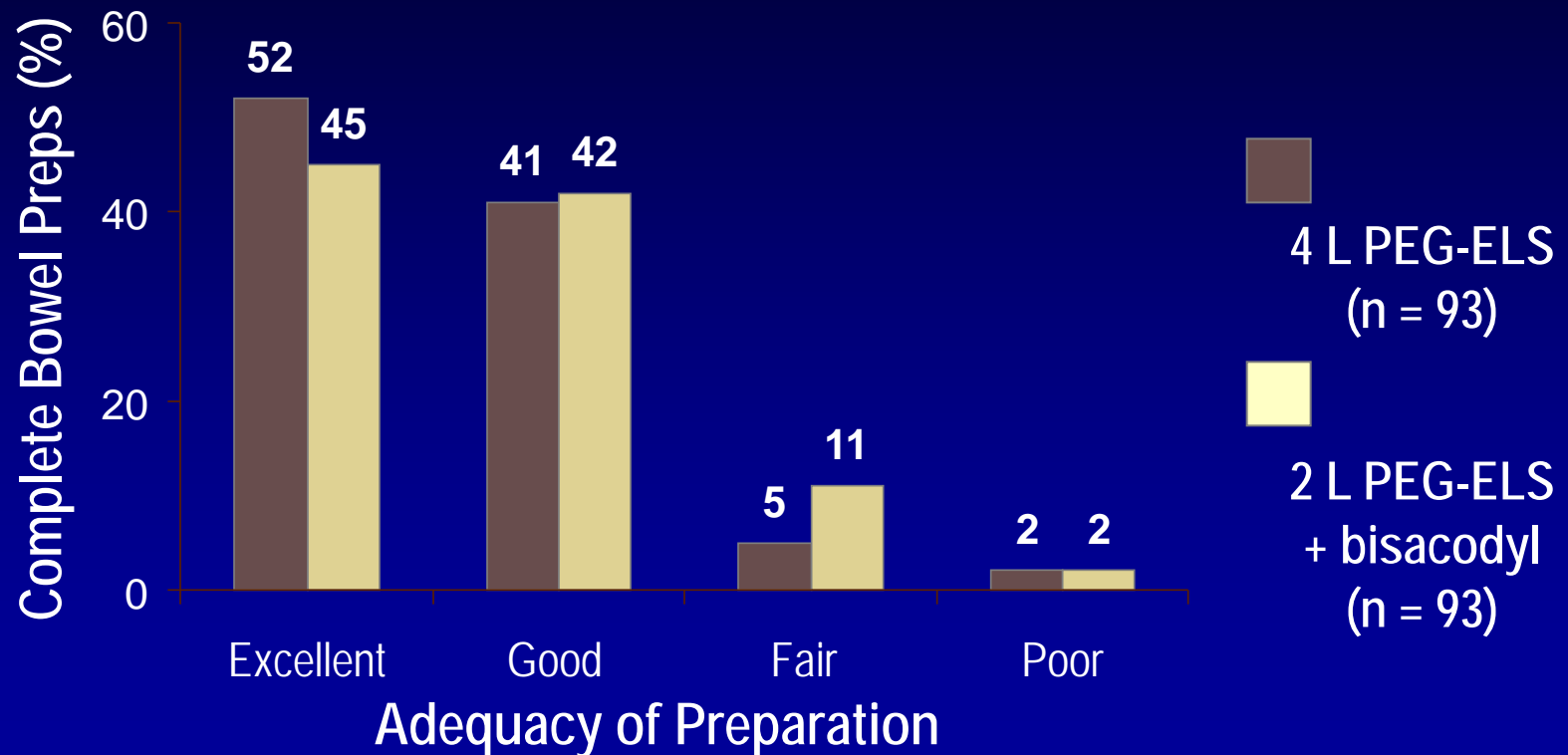
Group A = 4 L of PEG on the night before the procedure; Group B = 2 L of PEG on the evening before and 2 L on the morning of the procedure.



# Half-Iytely

## Efficacy Results

- Quality of cleansing was not significantly different between groups ( $P = 0.16$ )



# Rates of inadequate preparation in clinical reports

- Rates of 20-40%
- References:
  - Froehlich GIE 2005;61:378-84
  - Harewood GIE 2003;58:76-9
  - Lebwohl DDS 2010;55:2014-20
  - Ness AJG 2001;96:1797-802
  - Athreya Aust NZ Surg 2011;81:261-5
  - Borg CGH 2009;7:670-5
  - Chung J Clin Gastro 2009;43:448-52
  - Hendry Colorectal Dis 2007;9:745-8

# Recent changes in bowel preparation guidelines

- Split-dosing preferred
- USMSTF (ACG, ASGE, AGA) and ACG/ASGE quality task force have both adopted the following recommendation:
  - Clinicians in practice should achieve adequate rates of bowel preparation in  $\geq 85\%$  of outpatient examinations on a per physician basis
    - Consequences of 20-40% rates of inadequate preparation are too great a burden (1% rule)

# Adequate vs inadequate

- MSTF operational definition: if the preparation allows identification of lesions > 5 mm in size then the preparation is ADEQUATE
  - Not a bowel preparation scale
  - Made-up operational definition based on the biology of colon polyps
- ADEQUATE for WHAT?
  - Adequate to follow the screening and surveillance intervals recommended in MSTF guidelines

# Patient perspective on cleansing endpoints

- Patient should care first about the quality of the preparation after completion of intra-procedural cleansing
  - Affects the quality of mucosal inspection (effect is considerably less than the effect of the operator)
  - Affects the interval before the next examination
  - Patients will assume safety (rightly so)
  - Tolerability is very important to patients (they may NOT understand that efficacy is even more important)

# The judging point

- The judging point is the point in time when the prep is graded (and adequacy determined)
- From the patient and clinicians' perspective the judging point comes after completion of the intraprocedural cleansing
  - i.e.: at the judging point patients and clinicians don't care at all about fluid or other material that was removed

# Clinician perspective on cleansing endpoints

- Same as the patient's with one key difference:
- Efficiency: clinicians do not want to expend great effort to reach the judging point
  - If the work required to move marginal preps to adequate preps is excessive clinicians will abandon or modify a prep or abandon intraprocedural cleansing
  - This aspect of bowel cleansing efficacy is not captured by the clinical judging point

# Intraprocedural work

- 525 patients
- Mean procedure time: 24.1 minutes
- Mean washing and suctioning time (4.1 minutes (17% of all procedural time))
- Adequacy conversion rate by intraprocedural cleaning: 90% to 96%

- MacPhail et al GIE doi10.1016/j.gie.2014.05.002



# The clinician and efficacy:

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- 2 things to care about:
  - How often did we fail? (prep inadequate)
  - How much work did it take to achieve the level of adequacy?

# Bowel preparation scales

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- Aronchick
  - Aronchick GIE 2004; 60: 1037-8
- Ottawa
  - Rostom GIE 2004;59: 482-6
- Boston
  - Lai GIE 2009; 69: 620-25
  - Calderwood GIE; 2010; 72;686-92
- Chicago
  - Gerard; Clinical Translational Gastroenterology (2013) 4, e43; doi:10.1038/ctg.2013.16

# Bowel preparation scales

Scale	Validated	Considers retained fluid	Predicts an adequate preparation
Aronchick	Yes	Yes	
Ottawa	Yes	Yes	
Boston	Yes	No	Score of $\geq 2$ in each segment
Chicago	Yes	Yes	Score of $\geq 25$ defines a preparation that allows $\geq 95\%$ of mucosa to be seen
“Modified Chicago”		No	

# Boston Bowel Preparation Scale

- Right, transverse and left colon segments
  - 0 = unprepared colon segment with stool that cannot be cleared
  - 1 = portion of mucosa in segment seen after cleaning, but other areas not seen because of retained material
  - 2 = minor residual material after cleaning, but mucosa of segment generally well seen
  - 3 = entire mucosa of segment seen well after cleaning
- Total score ranges from 0 to 9
  - Lai et al GIE 2009;69:620-25

# Chicago Bowel Preparation Scale

- Cleaning scores
  - 0 = unprepared colon segment with stool that cannot be cleaned (> 15% of the mucosa not seen)
  - 5 = portion of mucosa in segment seen after cleaning; but up to 15% of the mucosa not seen
  - 10 = minor residual material after cleaning, but mucosa of the segment generally well seen
  - 11 = entire mucosa of segment well seen after washing
  - 12 = entire mucosa of segment well seen before washing (suctioning of liquid allowed)
- Fluid scale (not shown here)
  - Gerard Clin Trans Gastroenterol (2013) 4, e43;doi:10.1038/ctg.2013.16

# Correlation with adequate preparation

- Boston BPS

- Overall score  $\geq 6$  or score  $\geq 2$  *in each segment* predicts doctors will follow screening and surveillance guideline
  - Calderwood GIE; 2014; 80:269-76

- Chicago BPS

- Score of 25-36 predicts adequate preparation ( $\geq 95\%$  of mucosa seen) by definition
  - Gerard Clin Trans Gastroenterol (2013) 4, e43;doi:10.1038/ctg.2013.16

# Bowel preparation scales

Scale	Validated	Considers retained fluid	Predicts an adequate preparation
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Chicago	Yes	Yes	Score of $\geq 25$ defines a preparation that allows $\geq 95\%$ of mucosa to be seen
"Modified Chicago"		No	

# Should bowel prep studies have an ADR endpoint?

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- No



# What else should clinician's care about?

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- Why do patients fail bowel preparation regimens?
  - Medical factors
  - Patient factors

# Medical factors

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- Chronic constipation
- Opioids, tricyclics
- Obesity
- Diabetes mellitus
- Previous colon resection
- Previous incomplete colonoscopy

# Patient factors

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- Poor health literacy
  - Medicaid insurance
  - English not first language
    - Solution: navigation
- Low patient activation
  - Possible solution: education

# Endoscopists frequently don't adjust for predictors

- Use high volume aggressive preparations in all patients?
  - Patients are dissatisfied and go elsewhere
- Use low volume well-tolerated preparations in all patients?
  - Higher rates of inadequate preparation
- Why not adjust the dose for predictors?
  - Deceived by non-inferiority studies
  - Offering multiple preparations increases costs
  - Adjustment requires costly closed access or phone triage

# A clinician's recommendations to the FDA

- Safety is a presumed requisite
- Discourage evening-before regimens from further testing
- Encourage testing in hard to prepare populations
- Encourage use of efficacy scales that get at endpoints relevant to patients and clinicians
  - Should reflect rates of inadequacy
  - Should reflect clinical judging point
  - Should reflect the work required to reach the judging point
- Place greater value on tolerability

# Key research questions for investigators:

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- What scale in clinical trials best reflects important outcomes re: efficacy?
  - Adequacy rate
  - Work to achieve adequacy
- What preparations are best tolerated?  
Most likely to be repeated? i.e. studies with these factors as primary endpoints
- What preparations are most effective in difficult to prepare patients?



# Open Forum Q & A





# Questions?

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