

Necrotizing Enterocolitis: Using Regulatory Science and Drug Development to Improve Outcomes

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ecrotizing enterocolitis (NEC) is the most common intestinal pathology and cause of death between 2 and 8 weeks of life in neonates born extremely preterm. NEC has an unpredictable and often sudden onset with a rapidly progressive clinical course.¹ The diagnosis is currently made through a constellation of clinical observations and radiographic findings (eg, abdominal distention, bloody stool, pneumatosis intestinalis). NEC is likely triggered by a variety of insults resulting in a final pathway of intestinal dysfunction, inflammation, injury, and necrosis. Although clinical associations (eg, enteral feeding, blood transfusion), predisposing risk factors (eg, prematurity, altered intestinal microbiome, growth restriction), and specific molecular pathway involvement (eg, Toll-like receptor-4 signaling) are well established, the interactions between each of these factors and exposures are not fully understood.^{2,3} There are currently no licensed drugs or biologics for the prevention and/or treatment of NEC.

The Critical Path Institute is an independent, nonprofit organization committed to transformational improvement of the drug development process. The Food and Drug Administration working with the Critical Path Institute established the International Neonatal Consortium (INC) in 2015 to advance regulatory science for neonates. A working group for NEC was established to identify challenges associated with the development and licensing of products for the prevention and/or treatment of NEC. In this review, the INC NEC working group addresses key issues that relate to the diagnosis, prevention, and treatment of NEC while suggesting a path forward to evaluate the safety and efficacy of each product. Despite years of clinical investigation, additional key data elements are needed to meet the requirements of regulatory agencies and evidence-based medicine.⁴ These include reliable diagnostic criteria, biomarkers predictive of risk and prognosis, and criteria for the design and conduct of clinical trials with consistent and clinically meaningful outcome measures for therapeutic trials.

- INC International Neonatal Consortium
- NEC Necrotizing enterocolitis
- RCT Randomized controlled trial
- SIP Spontaneous or focal intestinal perforation

Diagnosis

Consistent diagnostic criteria are essential to perform epidemiologic studies, to provide a gold standard for biomarker development, and to create appropriate outcome measures for clinical trials. NEC is likely not a single clinical entity. In addition, significant variation in presentation and clinical course has added to the difficulty in arriving at universally accepted diagnostic criteria. The initial system proposed by Bell⁵ and modified by Kliegman⁶ consisted of 3 stages of NEC (I-suspected; II-definite; III-advanced). Clinical trials and cohort studies have varied in the inclusion of suspected or stage I NEC, increasing the difficulty of estimating disease burden and interpreting meta-analytical syntheses of clinical data.

More recently, 2 important distinctions have prompted the adoption of the diagnostic term "preterm NEC." Spontaneous or focal intestinal perforation (SIP) and NEC are common but distinct clinical entities.⁷ SIP generally presents within 10 days of birth, with little or no evidence of bowel wall necrosis. Preterm NEC is more likely to occur 2-8 weeks after birth resulting in focal or widespread intestinal necrosis. Preterm NEC represents a poorly regulated host response to altered microbial colonization/invasion and/or alterations in perfusion. The immunologic and hematologic changes in preterm NEC have been extensively reviewed and are essential to the diagnosis and exclusion of other conditions such as feeding intolerance. Septic ileus is common in preterm neonates and is often associated with inflammation, thrombocytopenia, or coagulopathy. Because there is overlap between SIP, septic ileus, and preterm NEC, consistent criteria are crucial to ensuring that neonates most likely to have preterm NEC are included in clinical research, and those with other

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conditions are excluded.⁸ Furthermore, if SIP cases are included as a diagnosis of NEC (as can occur using the Bell criteria) in clinical trials evaluating the efficacy of interventions, then results may lead to skewed or incorrect conclusions,⁸ and this may have occurred in several of the probiotic prevention trials. Finally, some patients with abdominal signs and bloody stools are noted to have cow's milk protein allergy. A more aggressive form of food protein-induced enterocolitis syndrome can be confused with NEC.

Term/late preterm NEC (term NEC) is almost exclusively seen in infants with gastroschisis, a hypoxic-ischemic insult, or cyanotic congenital heart disease.

The initial meeting of the INC NEC Workgroup held in conjunction with the NEC Society in April 2017 found consensus that the lack of a robust, universally accepted case-definition for NEC is a significant barrier to progress in investigating pathogenesis and improving efforts to prevent and treat this devastating disease. There was also general consensus that a more rigid case-definition for preterm NEC would improve clinical research but may have less value in clinical decision making, given that the only gold standard in the diagnosis of NEC is the pathologic analysis of resected or autopsied intestinal tissue.

Recent proposals to improve the definition of preterm NEC have included distinguishing between NEC and SIP in all clinical studies and excluding cases of SIP from analyses of studies aimed at either the prevention or treatment of NEC; excluding infants with a postmenstrual age of >36 weeks as this may be a fundamentally different process from preterm NEC; a "2 out of 3 rule" that requires at least 2 of the following diagnostic criteria for preterm NEC: pneumatosis intestinalis or portal venous gas, thrombocytopenia, and/or appropriate timing of onset⁸; a sophisticated point system based on gestational age and clinical and radiologic findings⁹; avoiding use of a fixed loop of bowel, gasless abdomen, and increased or bilious gastric aspirates in diagnostic criteria, as they have a low positive predictive value for NEC.⁹

Developing a Meaningful Definition

With these insights in mind, we propose a diagnostic approach summarized in the **Figure** with an emphasis on timing of onset (x axis) and clinical/radiographic evidence (y axis). Preterm NEC occurs most commonly between 30 and 32 weeks postmenstrual age, regardless of gestational age at birth. For clinical research purposes, a diagnosis of "preterm NEC" may not be appropriate in these situations: preterm neonates (<29 weeks of gestation) with intestinal perforation in the first 10 days after birth that occurs without evidence of pneumatosis intestinalis, portal venous air, or necrotized intestinal tissue at surgery or autopsy; term and late preterm (>36 weeks of gestation) neonates; neonates with isolated feeding intolerance; neonates with congenital cyanotic heart disease; and neonates with gastroschisis.

Neonates with preterm NEC would be further characterized as having either medical or surgical NEC based on the confirmation of necrosis at the time of laparotomy. Neonates with NEC that do not meet the criteria for preterm NEC should be classified as either "atypical NEC" or "term NEC" for reporting in clinical research. Applying this narrower case definition of preterm NEC (as described in the **Figure**) may enrich the potential population of preterm neonates for enrollment in clinical trials, minimize larger sample sizes needed for cohort studies, and generate more robust data. This new case definition of NEC should be evaluated against the Bell classification system prospectively and data evaluated to confirm that the approach will improve study analyses and interpretation.

Practical Recommendations

Given that definitions of NEC will be used across multiple treatment development programs, databases, clinical trials, cohort studies, case-control studies, and case series should capture the individual components of proposed case-definitions, and the results should be published. This would allow consistency in case selection and meta-analyses of any studies. The most efficient way to do this is to define a "data standard" for NEC that comprises the individual components of proposed definitions (**Table I**). These criteria will further improve the impact of clinical research in NEC: operationalizing diagnoses as case definitions, accepting that these are as still imperfect; clearly distinguishing case definitions for research purposes from criteria that are used to guide patient care; engaging editors and reviewers to include clear case definitions in all NEC-related

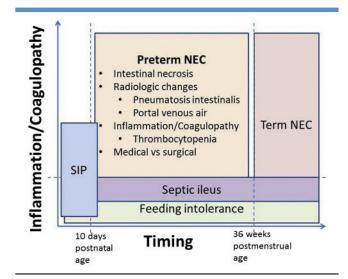


Figure. Proposed diagnosis of preterm NEC requires: (1) signs (abdominal distention and/or hematochezia); (2) timing (between postnatal day 10 and 36 weeks corrected gestational age; most common between 30-32 weeks postmenstrual age); (3) at least 1 of the following: (a) intestinal necrosis at laparotomy or autopsy; (b) either pneumatosis intestinalis or portal venous air (by radiograph or ultrasound); or (c) evidence of vasculitis, coagulopathy, or inflammation in the absence of bacterial, fungal, or viral infection.

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Table I. NEC data standards						
Inclusion criterion						
Risk factors	Gestational age at birth					
	Small for gestational age at birth					
	Postmenstrual age at onset					
	Feeding type					
Clinical signs	Abdominal distention Hematochezia					
	Abdominal discoloration					
Laboratory/surgical	Thrombocytopenia					
evidence	Coagulopathy					
	Metabolic acidosis					
	Tissue necrosis					
Radiologic signs	Pneumatosis intestinalis (definite vs possible)					
(radiograph	Portal venous gas					
or ultrasound)	Pneumoperitoneum					
Exclusion criteria	Constance intesting perforation					
Diagnoses	Spontaneous intestinal perforation Cyanotic congenital heart disease					
	Gastroschisis					
l	Hypoxic ischemic encephalopathy					

Modifiable factors that contribute to current case definitions of NEC. Reporting of these key items in future clinical trials, cohort studies, and case series is essential to developing consistent diagnostic criteria for NEC and allowing for severity ratings to be developed.

publications, which may include abandoning the Bell criteria completely or excluding cases with Bell stage 1 (at best inclusion of appropriate data standards; **Table I**); and including long-term outcomes that are known to be associated with NEC to enhance our understanding of the relationship between case definitions and health outcomes (**Table II**).

Future developments include promising diagnostic modalities such as abdominal ultrasound and fecal calprotectin. In expert hands, ultrasound may be more sensitive than abdominal radiograph evidence of pneumatosis intestinalis to diagnose NEC, but this approach has not become universal or standard-of-care and should be further investigated.

Biomarkers

Significantly reducing the clinical burden of NEC requires innovative approaches. These include identifying novel biomarkers through comprehensive study of human biologic samples (fluids, tissues), using high content multi-omics technologies (eg, proteomics, metabolomics, genomics), and integrating (clinical and biologic) computational analyses.¹⁰ The *BEST Resource* defines a biomarker as: "A defined characteristic that is measured as an indicator of normal biological processes, pathogenic processes, or response to an exposure or intervention. Molecular, histologic, radiographic, or physiologic characteristics are types of biomarkers (https://www.ncbi.nlm.nih.gov/books/NBK338448/)." The need to establish a "gold standard" case-definition for NEC is matched by the need for biomarkers, a priori risk assessment (probability of disease), and prediction of outcome. Currently, the means for the early detection of intestinal injury leading to NEC and its progression do not exist.

Table II. Health outcomes associated with NEC					
Gastrointestinal	Cholestasis				
	Parenteral nutrition at discharge from the neonatal intensive care unit				
	Marker of growth (eg, delta z score from birth to neonatal intensive care unit discharge for weight, length, and head circumference)				
	Days to full feedings				
	Intestinal stricture/obstruction				
Pulmonary	Bronchopulmonary dysplasia				
. annonal j	Pulmonary hypertension				
	Pulmonary vein stenosis				
Central nervous system	Periventricular leukomalacia Neurodevelopmental delays				

Reporting of these outcomes is valuable in assessing correlations between a given case definition and morbidity.

Evaluating Biomarkers

Biomarker development requires a discovery phase including identification of the specific molecular mechanisms and pathways involved in preterm NEC and an evaluation phase to determine predictive value. These phases should be completed before any biomarkers are used in clinical trials to evaluate any potential novel therapies. To fully understand the utility of a biomarker, a clear understanding of disease prevalence (prior probability) is needed in the test population. This depends on a shared, reliable definition of the disease process. The predictive value (diagnostic accuracy) of a test is highly dependent on disease prevalence, which for a rare disease like NEC (eg, 2016 Vermont Oxford Network data IQR 3.4%-9.4%) is likely to be confounded by a high false positive rate needed to achieve high sensitivity. Biomarkers used in studies of prevention strategies will require a different approach than biomarkers used to identify effectiveness of various treatment approaches. Multivariate models with standard measures along with Bayesian models that provide conditional probabilities may together provide key differential insights.

Food and Drug Administration guidance regarding the development of biomarkers used in multiple drug development programs is currently being revised (https://www.fda. gov/downloads/Drugs/GuidanceComplianceRegulatoryInfor mation/Guidances/UCM230597). European Medicines Agency guidance includes the following key concepts (http://www.ema.europa.eu/docs/en_GB/document_library/ Regulatory_and_procedural_guideline/2009/10/WC50000 4201.pdf)¹¹: context of use: "Full, clear and concise description of the way a novel methodology is to be used and the medicine development related purpose of the use. The Context of Use is the critical reference point for the regulatory assessment of any qualification application."; endpoints, including sensitivity, specificity, predictive values, and likelihood ratios as well as relationship to the clinical state of the neonate; clinical utility, including impact on patient management and outcome; standard of truth, as defined or a surrogate identified; analytic platform, including full validation of any analytical method

Sample					References
Biomarkers	source	Sensitivity	Specificity	Strengths (S) and limitations (L)	Authors, Year
Abdominal ultrasound	Ultrasound	Low	Low to high	L: High specificity may be limited to more advanced disease L: Low sensitivity	Janssen Lok et al ¹² , 2018
Calprotectin	Stool	Low-high	Low-medium	 S: Levels are usually elevated in patients with NEC and correlate with disease severity. L: Can be elevated in preterm infants for reasons besides NEC, limiting its specificity. L: Sensitivity not consistently high across studies to warrant use as a biomarker to accurately "rule-out" NEC. 	MacQueen et al ¹³ , 2016 Pergialiotis et al ¹⁴ , 2016
CBC	Serum			L: Elements of CBC are not sensitive or specific for NEC.	Gordon et al ¹⁵ , 2016
Claudins CRP	Urine Serum	Low Low-high	Low Low	 L: Associated with NEC, but sensitivity and specificity are low. S: Unlikely normal in the setting of NEC, though sensitivities among studies varies. L: Relatively slow rise, rendering it impractical for early diagnosis. 	Thuijls et al ¹⁶ , 2010 Cetinkaya et al ¹⁷ , 2011 Pourcyrous et al ¹⁸ , 2005 Yakut et al ³² , 2014
Cytokines	Serum			 L: Low specificity. S: IL-6, IL-8, and IL-10 are associated with NEC, and IL-8 appears to have high sensitivity and specificity. L: IL-8 has only been studied to a limited extent. 	Benke et al ¹⁹ , 2013 Benke et al ²⁰ , 2014
C5a	Serum			L: Strongly associated with NEC though has only been studied to a limited extent.	Tayman et al ²¹ , 2011
EGF	Serum			L: Limited investigation. No reported validity testing.	Nair et al ²² , 2008 Shin et al ²³ , 2000 Chan et al ²⁴ , 2014
Genomics	Serum			 S: Variants found to be associated with NEC L: No studies assess accuracy of variants in NEC diagnosis or prognostication. L: Expensive 	Chan et al ²⁴ , 2014 Hartel et al ²⁵ , 2016 Sampath et al ²⁶ , 2017
Hydrogen extraction	Exhaled breath	Medium	Medium	 S: Noninvasive collection and moderate sensitivity and specificity. L: Limited investigation. 	Cheu et al ²⁷ , 1989
I-FABP	Serum or urine	Low	Medium	S: Moderate specificity (91%) for serum I-FABP in meta-analysis of 7 studies L: Low sensitivity and specificity for urinary I-FABP	Yang et al ²⁸ , 2016
IAIP	Serum	High	Medium	 S: High sensitivity and NPV. May be very useful for ruling-out NEC in suspected cases. L: Limited investigation. 	Al-Hamad et al ²⁹ , 2017
Metabolomics	Serum or urine			 L: Unclear whether lalp can distinguish NEC from sepsis. S: Population based assessment of metabolic screen utility for identifying high risk of NEC (Sylvester) S: Metabolites linked to possible NEC linked dysbiosis (Morrow) L: poor PPV 	Morrow et al ³⁰ , 2013 Sylvester et al ³¹ , 2017
IMA	Serum	Medium	Low	S: High sensitivity than CRP in one study. L: Limited investigation.	Yakut et al ³² , 2014
Microbiota analysis	Stool	Low-high	Low-high	 S: Very high sensitivity and specificity with different models reported in one study. L: Inconsistency in microbiome profiles across studies. L: Limited sample size for models with high sensitivity 	Morrow et al ³⁰ , 2013 Pammi et al ³³ , 2017
NIRS	Skin lead			and specificity. S: Possible use for monitoring course after initial NEC diagnosis to detect complications	Shah et al ³⁴ , 2017
PAF	Serum and Stool			S: Associated with NEC. L: Low specificity.	Amer et al ³⁵ , 2004 Rabinowitz et al ³⁶ , 2001
Procalcitonin	Serum	Low-medium	High	L: Limited investigation. S: High specificity if limited to patients with NEC and sepsis. L: Unable to identify patients with NEC without sepsis.	Cetinkaya et al ¹⁷ , 2011 Turner et al ³⁷ , 2007

CRP, c-reactive protein; cbc, complete blood count; IFABP, intestinal fatty acid binding protein; IAIP, inter-alpha inhibitor protein; IMA, inferior mesenteric artery; NIRS, near infrared spectroscopy; PPV, positive predictive value; IL, interleukin; PAF, platelet activating factor.

(selectivity, carry- over, lower limit of quantification, calibration curve, accuracy, precision, dilution integrity, matrix effect, stability).

To avoid inconclusive clinical studies and waste of resources, an operational case definition of NEC must be prespecified and the candidate biomarker must then be tested for predictive value. Only then can a validated biomarker be used as either a primary (surrogate) or key prespecified secondary outcome in clinical trials.

Biomarkers in NEC

Molecular and imaging biomarkers have been extensively studied to identify early signs of NEC or to predict prognosis, and these are summarized in **Table III**. Comparator groups (case and control definitions), study size, and location (single or multicenter) can vary widely. Statistical approaches and study design also vary between studies. These limitations, along with a failure to prospectively validate candidate biomarkers in multicenter studies, render most biomarkers published to date of limited utility for drug development. In addition, utility of biomarkers is limited if costs are excessive or use in clinical practice is difficult.

Of the candidate biomarkers reviewed in Table III, it may be that no single marker possesses sufficient test performance characteristics (eg, specificity, sensitivity, positive predictive value) to anticipate a clear picture of clinical validity and utility will be gained with further study. However, it may be possible to combine disparate features that capture different aspects of either the gold standard definition being championed herein or reflect the current understanding of NEC pathophysiology. Accordingly, a composite approach of abdominal ultrasound for the presence of pneumatosis (high specificity), with a highly sensitive biomarker to capture enteric inflammation (stool calprotectin) or mucosal injury (intestinal fatty acid binding protein [IFABP]) may be sufficiently complementary. Given the well-documented emergence of proteobacteria enteric blooms preceding NEC in human patients, further study of the pathophysiologic mechanism by which widespread dysbiosis in neonatal intensive care unit newborns produces NEC is likely justified to gain greater biologic insight and discover clinically useful biomarkers.

Practical Recommendations

- (1) Develop appropriate biomarkers before performing confirmatory trials.
- (2) Limit validation studies to definitive, established cases of preterm NEC.
- (3) Conduct and report research that gives comprehensive information about each biomarker by defining its context of use, validating it across multiple centers, and developing predictive values or likelihood ratios with sensitivity and specificity. Studies should determine the effects of employing the biomarker in clinical practice.
- (4) Refine and enhance a priori risk assessment through subcohorting.
- (5) Identify unique biology, develop novel insight to causality, and capture both with well- characterized biomarkers.

INC Consortium activities could develop shared ways of working or undertake the development of biomarkers to be used in multiple drug development programs.

Clinical Trial Design: Probiotics

This section uses the specific example of probiotics to illustrate how existing clinical trials of NEC have (or have not) used state-of-the-art trial design and informed regulatory requirements. The large number of randomized controlled trials (RCTs) and cohort studies of probiotic administration is commendable and has moved the field forward. However, many sites no longer maintain equipoise to conduct unbiased studies, reinforcing the need to blind treatment assignment because there is already extensive use of many of these biologic agents worldwide. This also provides an opportunity to consider the quality of studies performed to date and how future studies of NEC prevention can improve upon currently available data and adapt consistency and excellence of methodology into practice. Many of the concerns outlined below also apply to published clinical research of dietary interventions (eg human milk fortifier, lactoferrin, and donor milk) and other treatments (antibiotic prophylaxis, preventive steroids, immunoglobulin A, and several pharmaceutical products in development) to prevent NEC. Systematic reviews to identify strengths and weaknesses of the academic literature through evaluation of selected elements of clinical trials are useful exercises. To evaluate studies on probiotics as an example, RCTs were identified by performing a PubMed search for recent publications and drawing on several recent systematic reviews.^{38,39} All RCTs that evaluated probiotics in neonates and reported on NEC were included. Of 117 records screened, a total of 46 RCTs enrolling 12 185 infants were identified for inclusion in an analysis of key components of clinical research (Supplemental Table and Supplemental References; available at www.jpeds.com). A clinical development program must involve multiple clinical components discussed below.

Pharmaceutical Quality Trial reports did not consistently provide information on the probiotics used, often reporting only genus and species (but not specific strains or explicit product data). Concerns about probiotic quality control were highlighted by a recent study that found the content of most commercially available probiotic products do not match the label.⁴⁰ The Quality Control of probiotic products is inconsistent between countries and health systems. Specific regulation by the European Food Standards Agency promotes quality in Europe but does not meet the needs of pharmaceutical regulators. Data on strain-specific actions remain very sparse and few studies report validation of purity and number of viable organisms administered.⁴¹ Several trials included potential confounders such as lactoferrin or a prebiotic administered in conjunction with probiotic supplementation.⁴² High-quality studies involving pharmaceutical grade products with large sample sizes are lacking and in urgent need of completion.

Dosage Regimen

None of the studies offered a justification for the dose used. Common dosing regimens ranged from 10^8 to 10^9 colony forming units per day (a fairly small range for replicating organisms), with most studies initiating probiotic supplementation in the first week of postnatal life and continuing for at least one month. This represents a significant gap in knowledge that must be addressed.

Study Population

Baseline NEC rates varied considerably, ranging from 0% to 18%. This may reflect differences between centers and countries in the incidence and definition of NEC, differences in

standard care and treatments, and extent of exposure to human milk. The reporting of a specific case definition, data standard (**Table I**), and concomitant treatments in all clinical trials, cohort studies, and case series of NEC is essential.

Outcome Measures (Surrogate and Clinically Meaningful)

Most NEC trials evaluate NEC and/or death as a primary outcome, though many do not include a comprehensive assessment of additional related outcomes associated with the disease that significantly impact the health of the patient. Table II includes several measurable outcomes that influence potential effectiveness of NEC prevention or treatment trials. In our example of probiotics, no RCT reported a pre-planned assessment of longer-term clinical outcomes. RCTs did not identify whether they were contributing to a surrogate, functional, or other clinically relevant outcome (or a combination). This occurred despite the essential need to document longer-term safety and efficacy of any medicinal products in this population. We hypothesize that the inclusion of additional outcome measures to future clinical trials will provide additional support for intervention effectiveness and allow clinicians, regulators, and pharmaceutical companies reach appropriate to conclusions from the study results. In our meta- analysis, it is important to note that varying definitions of NEC were used reflecting a lack of consistency among studies, which makes the data more difficult to analyze and interpret (see 'Diagnosis').

Safety Reporting

Concerns about safety include the development of microbial resistance, risk of probiotic-associated sepsis, administration of a contaminated product, the presence of any additives not included on the package label, and cross-contamination between supplemented and unsupplemented neonates.⁴³ None of the trials included assessment of the effects of early probiotic administration on the development and stability of the intestinal microbiome and any related functional consequences. Despite these concerns, the use of *Lactobacillus rhamnosus* GG was associated with septicaemia only once during treatment of many preterm neonates over prolonged periods of time.^{44,45} No RCT reported whether individual adverse events were analyzed with respect to causality or severity, or the results of these assessments.

Data Quality

Several of the RCTs lacked description of trial registration. In addition, there was significant uncertainty regarding blinding, concealment of treatment allocation, randomization procedures, duration of follow-up, selective reporting, and exclusion of neonates after randomization. RCTs also generally lacked statistical power with only 2 recruiting more than 1000 infants.^{46,47} The publications provided no information about measures taken to assure the quality of the data collected including extent of monitoring of data quality. In summary, although several studies demonstrated good quality and design, there were limitations with others, and potential conclusions from the meta-analyses should reflect this balance. Furthermore, it is possible that the discrepancy in the results from a large, randomized trial (Costeloe et al, no difference) compared with several meta-analyses reflects considerations in trial design as noted above.

Additional Challenges of Probiotic Trials

A meta-analysis of several underpowered clinical trials is not a substitute for data derived from well-designed, randomized trials of sufficient power that will be the standard required for licensing products that target NEC. A statistically significant effect found from a meta-analysis does not address many questions central to patient safety such as dosing, selection of the strain, and balance between efficacy and safety outcomes acting on diverse timescales. The "pragmatic" approach of replicating whatever dosage was used in a statistically significant clinical trial is highly problematic if the dosage regimen has no scientific foundation or if statistical significance is found in multiple studies that each use different doses and/or species of probiotic.

The challenges of determining appropriate sample size in dose-finding studies with preterm NEC as the primary outcome must be acknowledged. To compare 2 doses of a single probiotic strain with NEC as the primary outcome would require hundreds or thousands of infants depending on the baseline incidence of the disease. The only phase 1 dose escalation probiotic study in preterm neonates reported to date used the published range of probiotic doses then available (5 doses from 5×10^7 to 4×10^9 organisms) for 2 strains of validated purity and viability, with the composition of the fecal microbiota as the primary outcome.⁴⁸ Such an approach is feasible, but may not represent a reasonable surrogate outcome, as fecal microbiota may not correlate well with the specific outcome of NEC.

Finally, it should be noted that there is disagreement globally as to whether probiotics should be used to prevent NEC in preterm babies, and routine usage is standard of care practice in several countries. Lack of equipoise on probiotic effectiveness may preclude future international trials and influence subsequent clinical trial enrollment.

Practical Recommendations

If clinical research is to contribute to the development of therapies to prevent or treat NEC, a number of trial design issues must be addressed including the following: Core datasets comprising individual discrete data elements are required for case-definitions (**Table I**), outcomes (**Table II**), and concomitant treatments; reliable whole-population incidence figures, adjusted for major confounding variables such as gestational age and exposure to human milk; long-term cohort studies to better elucidate the natural history of the disease and validate candidate biomarkers of disease risk, progression, and outcome; formulations of appropriate pharmaceutical grade products with quality control measures; dose-finding studies;

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consideration of innovative methodologies for randomized and nonrandomized clinical studies (eg, Bayesian methods, adaptive designs, quasi-randomized observational studies, comparative effectiveness opt-out trials); within and between country collaborations; and strong parent-public support for research targeted upon NEC.

Conclusions

There is an urgent need to develop effective and safe approaches to prevent preterm NEC. Progress with the prevention and treatment of NEC requires consistent criteria for the diagnosis of the condition. This is also an essential prerequisite for the development of biomarkers and a gold-standard case-definition. The existing clinical research using probiotics for the prevention of NEC exemplifies the challenges inherent in designing adequately powered and high quality clinical trials of treatments for prevention of this disease, and clear, comprehensive outcome measures are not always described. An internationally agreed upon consensus casedefinition and validated biomarkers for NEC would be invaluable in facilitating regulatory ready treatment development programs. Agreement among key stakeholders that include clinicians, investigators, parents, regulators, and industry representatives will further facilitate the development of this urgently needed therapy to significantly improve outcome of preterm neonates.

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References

- 1. Patel RM, Kandefer S, Walsh MC, Bell EF, Carlo WA, Laptook AR, et al. Causes and timing of death in extremely premature infants from 2000 through 2011. N Engl J Med 2015;372:331-40.
- Caplan MS, Fanaroff A. Necrotizing: a historical perspective. Sem Perinatol 2017;41:2-6.
- **3.** Hackam D, Caplan M. Necrotizing enterocolitis: pathophysiology from a historical context. Sem Pediatr Surg 2018;27:11-8.
- 4. Turner MA, Portman RJ, Davis JM. Regulatory science in neonates: a framework that supports evidence-based drug therapy. JAMA Pediatr 2017;171:721-2.
- Bell MJ, Ternberg JL, Feigin RD, Keating JP, Marshall R, Barton L, et al. Neonatal necrotizing enterocolitis. Therapeutic decisions based upon clinical staging. Ann Surg 1978;187:1-7.
- Kliegman RM, Walsh MC. Neonatal necrotizing enterocolitis: pathogenesis, classification, and spectrum of illness. Curr Prob Pediatr 1987;17:213-88.
- Gordon PV, Swanson JR, Attridge JT, Clark R. Emerging trends in acquired neonatal intestinal disease: is it time to abandon Bell's criteria? J Perinatol 2007;27:661-71.
- Gordon PV, Swanson JR, MacQueen BC, Christensen RD. A critical question for NEC researchers: can we create a consensus definition of NEC that facilitates research progress? Semin Perinatol 2017;41:7-14.

- Battersby C, Longford N, Costeloe K, Modi N. Development of a gestational age-specific case definition for neonatal necrotizing enterocolitis. JAMA Pediatr 2017;171:256-63.
- 10. Gephart SM, Gordon PV, Penn AH, Gregory KE, Swanson JR, Maheshwari A, et al. Changing the paradigm of defining, detecting, and diagnosing NEC: perspectives on Bell's stages and biomarkers for NEC. Sem Pediatr Surg 2018;27:3-10.
- Sauer JM, Porter AC, Biomarker Programs, Predictive Safety Testing Consortium. Preclinical biomarker qualification. Exp Biol Med (Maywood) 2018;243:222-7.
- 12. Janssen Lok M, Miyake H, Hock A, Daneman A, Pierro A, Offringa M. Value of abdominal ultrasound in management of necrotizing enterocolitis: a systematic review and meta-analysis. Pediatr Surg Int 2018;34: 589-612.
- **13.** MacQueen BC, Christensen RD, Yost CC, Lambert DK, Baer VL, Sheffield MJ, et al. Elevated fecal calprotectin levels during necrotizing enterocolitis are associated with activated neutrophils extruding neutrophil extracellular traps. J Perinatol 2016;36:862-9.
- 14. Pergialiotis V, Konstantopoulos P, Karampetsou N, Koutaki D, Gkioka E, Perrea DN, et al. Calprotectin levels in necrotizing enterocolitis: a systematic review of the literature. Inflamm Res 2016;65: 847-52.
- **15.** Gordon PV, Swanson JR, Clark R, Spitzer A. The complete blood cell count in a refined cohort of preterm NEC: the importance of gestational age and day of diagnosis when using the CBC to estimate mortality. J Perinatol 2016;36:121-5.
- 16. Thuijls G, Derikx JP, van Wijck K, Zimmerman LJ, DeGraeuwe PL, Mulder TL, et al. Noninvasive markers for early diagnosis and determination of the severity of necrotizing enterocolitis. Ann Surg 2010;251: 1174-80.
- 17. Cetinkaya M, Ozkan H, Köksal N, Akaci O, Ozgür T. Comparison of the efficacy of serum amyloid A, C-reactive protein, and procalcitonin in the diagnosis and follow-up of necrotizing enterocolitis in premature infants. J Pediatr Surg 2011;46:1482-9.
- Pourcyrous M, Korones SB, Yang W, Boulden TF, Bada HS. C-reactive protein in the diagnosis, management, and prognosis of neonatal necrotizing enterocolitis. Pediatrics 2005;116:1064-9.
- Benke T, Baumann S, Weninger M, Pones M, Reck C, Rebhandl W, et al. Comprehensive evaluation of 11 cytokines in premature infants with surgical necrotizing enterocolitis. PLoS One 2013;8:e58720.
- **20.** Benke TM, Mechtler TP, Weninger M, Pones M, Rebhandl W, Kasper DC. Serum levels of interleukin- 8 and gut-associated biomarkers in diagnosing necrotizing enterocolitis in preterm infants. J Pediatr Surg 2014;49:1446-51.
- **21.** Tayman C, Tonbul A, Kahveci H, Uysal S, Koseoğlu B, Tatli MM, et al. C5a, a complement activation product, is a useful marker in predicting the severity of necrotizing enterocolitis. Tohoku J Exp Med 2011;224: 143-50.
- 22. Nair RR, Warner BB, Warner BW. Role of epidermal growth factor and other growth factors in the prevention of necrotizing enterocolitis. Semin Perinatol 2008;32:107-13.
- 23. Shin CE, Falcone RA Jr, Stuart L, Erwin CR, Warner BW. Diminished epidermal growth factor levels in infants with necrotizing enterocolitis. J Pediatr Surg 2000;35:173-6. discussion 177.
- 24. Chan KY, Leung KT, Tam YH, Lam HS, Cheung HM, Ma TP, et al. Genome-wide expression profiles of necrotizing enterocolitis versus spontaneous intestinal perforation in human intestinal tissues: dysregulation of functional pathways. Ann Surg 2014;260:1128-37.
- 25. Härtel C, Hartz A, Pagel J, Rupp J, Stein A, Kribs A, et al. NOD2 loss-offunction mutations and risks of necrotizing enterocolitis or focal intestinal perforation in very low-birth-weight infants. Inflamm Bowel Dis 2016;22:249-56.
- **26.** Sampath V, Bhandari V, Berger J, Merchant D, Zhang L, Ladd M, et al. A functional ATG16L1 (T300A) variant is associated with necrotizing enterocolitis in premature infants. Pediatr Res 2017;81:582-8.
- 27. Cheu HW, Brown DR, Rowe MI. Breath hydrogen excretion as a screening test for the early diagnosis of necrotizing enterocolitis. Am J Dis Child 1989;143:156-9.

- 28. Yang G, Wang Y, Jiang X. Diagnostic value of intestinal fatty-acidbinding protein in necrotizing enterocolitis: a systematic review and meta-analysis. Indian J Pediatr 2016;83:1410-9.
- 29. Al-Hamad S, Hackam DJ, Goldstein SD, Huisman TAGM, Darge K, Hwang M. Contrast-enhanced ultrasound and near-infrared spectroscopy of the neonatal bowel: novel, bedside, noninvasive, and radiation-free imaging for early detection of necrotizing enterocolitis. Am J Perinatol 2018;35:1358-65.
- **30.** Morrow AL, Lagomarcino AJ, Schibler KR, Taft DH, Yu Z, Wang B, et al. Early microbial and metabolomic signatures predict later onset of necrotizing enterocolitis in preterm infants. Microbiome 2013;1:13.
- 31. Sylvester KG, Kastenberg ZJ, Moss RL, Enns GM, Cowan TM, Shaw GM, et al. Acylcarnitine profiles reflect metabolic vulnerability for necrotizing enterocolitis in newborns born premature. J Pediatr 2017;181:80-5 e1.
- **32.** Yakut I, Tayman C, Oztekin O, Namuslu M, Karaca F, Kosus A. Ischemia-modified albumin may be a novel marker for the diagnosis and follow-up of necrotizing enterocolitis. J Clin Lab Anal 2014;28: 170-7.
- 33. Pammi M, Cope J, Tarr PI, Warner BB, Morrow AL, Mai V, et al. Intestinal dysbiosis in preterm infants preceding necrotizing enterocolitis: a systematic review and meta-analysis. Microbiome 2017;5:31.
- 34. Shah BA, Migliori A, Kurihara I, Sharma S, Lim YP, Padbury J. Blood level of inter-alpha inhibitor proteins distinguishes necrotizing enterocolitis from spontaneous intestinal perforation. J Pediatr 2017;180: 135-140 e1.
- 35. Amer MD, Hedlund E, Rochester J, Caplan MS. Platelet-activating factor concentration in the stool of human newborns: effects of enteral feeding and neonatal necrotizing enterocolitis. Biol Neonate 2004;85:159-66.
- 36. Rabinowitz SS, Dzakpasu P, Piecuch S, Leblanc P, Valencia G, Kornecki E. Platelet-activating factor in infants at risk for necrotizing enterocolitis. J Pediatr 2001;138:81-6.
- Turner D, Hammerman C, Rudensky B, Schlesinger Y, Wine E, Muise A, et al. Low levels of procalcitonin during episodes of necrotizing enterocolitis. Dig Dis Sci 2007;52:2972-6.

- Aceti A, Gori D, Barone G, et al. Probiotics for prevention of necrotizing enterocolitis in preterm infants: systematic review and meta-analysis. Ital J Pediatr 2015;41:89.
- **39.** van den Akker CHP, van Goudoever JB, Szajewska H, Embleton ND, Hojsak I, Reid D, et al. Probiotics for preterm infants: a strain-specific systematic review and network meta-analysis. J Pediatr Gastroenterol Nutr 2018;67:103-22.
- **40.** Lewis ZT, Shani G, Masarweh CF, Popovic M, Frese SA, Sela DA, et al. Validating bifidobacterial species and subspecies identity in commercial probiotic products. Pediatr Res 2016;79:445-52.
- Drago L, Rodighiero V, Celeste T, Rovetto L, De Vecchi E. Microbiological evaluation of commercial probiotic products available in the USA in 2009. J Chemother 2010;22:373-7.
- 42. Manzoni P, Dall'Agnola A, Tomé D, Kaufman DA, Tavella E, Pieretto M, et al. Role of lactoferrin in neonates and infants: an update. Am J Perinatol 2018;35:561-5.
- Patel RM, Underwood MA. Probiotics and necrotizing enterocolitis. Sem Pediatr Surg 2018;27:39-46.
- **44.** Manzoni P, Lista G, Gallo E, Marangione P, Priolo C, Fontana P, et al. Routine lactobacillus rhamnosus GG administration in VLBW infants: a retrospective, 6-year cohort study. Early Hum Dev 2011;87(Suppl 1): S35-8.
- 45. Meyer MP, Alexander T. Reduction in necrotizing enterocolitis and improved outcomes in preterm infants following routine supplementation with Lactobacillus GG in combination with bovine lactoferrin. J Neo Peri Med 2017;10:249-55.
- 46. Costeloe K, Hardy P, Juszczak E, Wilks M, Millar MR. Bifidobacterium breve BBG-001 in very preterm infants: a randomised controlled phase 3 trial. Lancet 2016;387:649-60.
- 47. Jacobs SE, Tobin JM, Opie GF, Donath S, Tabrizi SN, Pirotta M, et al. Probiotic effects on late-onset sepsis in very preterm infants: a randomized controlled trial. Pediatrics 2013;132:1055-62.
- **48.** Underwood MA, Kalanetra KM, Bokulich NA, Lewis ZT, Mirmiran M, Tancredi DJ, et al. A comparison of two probiotic strains of bifidobacteria in premature infants. J Pediatr 2013;163:1585-91.e9.

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