Letters to the Editor

Use of contraception outside the terms of the product licence

That it should take our experts 17 pages to explain the problem of prescribing outside the licence of contraceptives surely exposes a credibility gap between regulation and prescribing. It seems we are now expected to know the detail of every licence of every drug we use and to tell the patient when we are outside the licence. This is not practical advice. For example, how do we know when prescribing the progestogen-only pill from up to 5 days after Day 1 without an additional method will then explain that this might cause confusion. I suggest the answer is none! To follow the advice of the Clinical Effectiveness Unit (CEU) would be time consuming and may confuse the patient. Furthermore, what about the great majority of prescribers, within and without family planning, who do not read our Journal? How are they expected to follow the advice given? The licence system is clearly discredit, and in my opinion can safely be ignored providing one follows the best expert prescribing advice available. That surely is what we actually do and will continue to do.

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Reply

Thank you for your opportunity to respond to the comments from Dr Michael Cox regarding our CEU Guidance on the use of contraception outside the terms of the product licence.1 Dr Cox considers that it is unnecessary and impractical to inform patients when drugs are prescribed in circumstances outside the terms of manufacturers’ product licences. He suggests that providing this information would cause confusion for patients.

The General Medical Council (GMC) website includes frequently asked questions on prescribing and indicates: “some medicines are routinely used outside the scope of their licence … where current practice supports the use of a medicine in this way it may not be necessary to draw attention to the licence when prescribing”2. Thus, the GMC supports doctors where current practice supports the use of a medicine in this way it may not be necessary to draw attention to the licence when prescribing. Nevertheless, in the context of contraceptive prescribing, patients will receive their medicine in the manner to which they are accustomed. This leaves the patient with no indication that the contraceptive they are using is prescribed outside the scope of their licence.

In developing evidence-based guidance documents the CEU undertake a systematic literature review and a search strategy. In addition to this process our Expert Group may identify publications that we have missed during our systematic review. In the development of guidance on ‘Drug interactions with hormonal contraception’ we did not identify any published evidence to support improved efficacy of combined oral contraception avoiding a pill-free interval for women using liver enzyme-inducing drugs. Nevertheless, during a further systematic review we received new evidence on ‘The use of contraception outside the terms of the product licence’ which identified one publication that provided some evidence to support a reduction in the pill-free interval. This evidence was taken into account in the most recent Guidance document.

The CEU are unable to sustain ‘living guidance’, which would be actively updated as new information becomes available. All CEU Guidance documents are developed with the intention of being updated every 3 years. We are grateful to all journal readers and Faculty members who identify errors or inconsistencies, which we will endeavour to resolve and rectify where necessary during the process of updating CEU Guidance.

Two CEU Guidance documents – those on ‘Emergency contraception’3 and ‘First prescription of combined oral contraceptive pill’4 – are due to be updated in 2006. We have requested feedback from Faculty members on these Guidance documents.

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Confusion surrounding liver enzyme-inducing drugs

In the CEU Guidance on ‘Drug interactions with hormonal contraception’ it states in Box 9 that “No evidence was identified that supports omitting or reducing the pill-free interval to reduce the risk of ovulation in women using liver enzyme-inducers (Good Practice Point)”. In contrast, in the CEU Guidance on ‘The use of contraception outside the terms of the product licence’ it states in Box 23 that ‘...women may be given advice regarding ‘tricycling’ combined hormonal contraception ...’ if using liver enzyme-inducing drugs (Good Practice Point)’. Please clarify.

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References

Drug interactions with hormonal contraception

As the authors of the CEU Guidance document on ‘Drug interactions with hormonal contraception’ make clear, the evidence has proven difficult to come by. But when the very-best evidence runs out, as clinicians we still have a woman in front of us who needs help: based on the next-best evidence …

I argue here that, of the three contraceptive interventions for long-term users of enzyme-inducing drugs (EIDs) using the combined oral contraceptive (COC), available data suggest that eliminating as many pill-free intervals (PFIs) as cycle control allows, plus shortening those that are taken to 4 days, will make a substantial contribution to effectiveness: at least as great as increasing the COC dose or added condom use.

Let’s look at data from a paper (Vlaming, 1999) which was reviewed by the World Health Organization (WHO) and the CEU itself, establishing beyond reasonable doubt that the enzymes induced by some antiretroviral activity may return, more in some women than others; and that the longer the PFI the greater the ovulation risk. The reverse is also true, as in the very title of one of the three review papers, namely ‘Shorter pill-free interval in combined oral contraceptives decreases follicular development’.1 The longer the PFI is, the less likely is ovulation elimination; and oddly enough the CEU recognises this in Table 3 when advising on the lower-risk drug interaction with non-liver enzyme-inducing antibiotics: “If fewer than seven pills are left in the packet after antibiotics have stopped the pill-free interval should be omitted.”2

1. Vlaming, 1999
2. CEU Guidance on ‘Drug interactions with hormonal contraception’, Table 3

So when prescribing to a man who perceives that his partner is already protected, the woman’s conception risk will not be lessened by using strong COCs than usual. The problem of breakthrough pregnancies with...
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EID use and normal 7-day PFIs first emerged in the 50–100 µg pill era! Indeed, in the Mayo Clinic-based collected series,1 16/25 women who, despite allegedly good pill-taking, conceived on emergency inductions were taking 50 µg pills; and the remaining nine were taking 100 µg pills (with mestrans!). Please, may we have our trickle back?

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References

Reply
We welcome the opportunity to respond to these comments on the FFPRHC Guidance on ‘Drug interactions with hormonal contraception’ published in the April issue of the Journal.1 Your correspondent draws attention to a paper by Spona et al where regard to a reduction in the pill-free interval in women taking concurrent liver enzyme-inducers.2 As explained in our response to your correspondent, Graham Davies, we failed to identify this paper during our systematic review for the ‘Drug interactions’ Guidance; but did identify it during development of our subsequent Guidance on ‘The use of contraception outside the terms of the product licence’.3

Within the limits of our resources, the CEU always endeavours to undertake a full comprehensive and systematic literature search in the Guidance. Nevertheless, relevant papers occasionally are missed by the search strategies used. We are always grateful to Faculty members for alerting us to evidence that we may have overlooked. Such evidence will be taken into account when Guidance is updated.

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References

Missed pill guidelines
We manage a family planning contraception service for the under-25s in South West Essex, and we appreciates our service’s commitment to the new missed pill guidelines. Our young service users often lead chaotic lifestyles with subsequent chaotic pill-taking. By promoting the new advice we feel that we would be giving them further leeway to miss pills, which could result in an increase in unwanted pregnancies. Some choose service users were taking 50 µg pills and would have difficulty following the new advice in the IFA leaftet. They have to rely on a clear explanation of pill taking from staff, and the old advice is a lot easier to explain verbally. At present the IFA leaftet advice contradicts that given in the patient information leaflet provided by the pill manufacturers. We understand that the manufacturers advice is unlikely to change since this would involve new product licences being sought. Our new words were discussed at Thurrock PCT’s Medicine Management Committee last month and it was decided that present all contraception providers working for the PCT should continue to adhere to the former missed pill advice. This recommendation is be taken to the South West Essex Medicine Management Committee.

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Reply
We welcome the opportunity to respond to these comments on the ‘new missed pill rules’ published by the WHO and endorsed in our Faculty Statement published in the April 2005 issue of the Journal.2 Your correspondents’ main points are that young people often have chaotic lifestyles and chaotic pill-taking routines3 and that the ‘new rules’ are at odds with information in the patient information leaflets provided by manufacturers.

We acknowledge the lifestyle factors that influence contraceptive choices for young people. The new ‘missed pill rules’ do not negate or contradict the responsibility of clinicians caring for young people to promote the fundamental importance of, regular, disciplined, pill-taking routines. Pragmatic measures, such as use of the alarm call facility on a mobile phone, can assist young people.4 However, 85% of the cases discussed in the Consent Advice 3 of the RCOG,5 and its success rates were only recorded in 60% of the case notes.6

We also note that the new WHO recommendations differ from the advice given in manufacturers’ leaflets. However, the problem of conflicting information from different sources is not new. Advice given in different manufacturers’ leaflets varies in some details, as does advice in the British National Formulary. Achievement of uniformity and consistency was one of the reasons given by the WHO for publishing the new advice.2

We disagree that the new advice is more difficult than the old to explain verbally to an individual patient. Each woman need only be given the ‘rules’ that apply to her own pill formulation (20 µg or ≥30 µg ethinylstradiol); there are fewer circumstances in which she must adopt any specific regime; and that she has missed ‘two for twenty’ or ‘three for thirty’ pills; and there are fewer circumstances in which emergency contraception must be considered (only if pills have been missed in Week 1 of the pill-taking cycle).

Thus, the CEU stands by their endorsement of the WHO’s ‘missed pill rules’. Nevertheless, an individual clinician managing an individual patient may choose to give different advice according to individual circumstances or based on his/her own interpretation of available evidence.

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Preoperative counselling for female sterilisation
I read with great interest the article by Philip Owen and colleagues on documentation of preoperative counselling for female sterilisation.1 A similar audit was conducted recently in the Department of Obstetrics, Gynaecology and Oncology, Nobles Hospital, Isle of Man and included 81 cases which were admitted for sterilisation between October 2002 and September 2004. The audit standards were obtained from the Clinical Guidelines No. 4 of the Royal College of Obstetricians and Gynaecologists (RCOG), published in January 2004) and RCOG Consent Advice 3 (published in October 2004). Data were collected retrospectively from the case notes.

The results of the audit were as follows:

1. Discussion regarding vasectomy was recorded in 60% of the case notes.
2. Discussion regarding risks specific to laparoscopy was recorded in 60% of the case notes.
3. Discussion regarding Mirena® was recorded in 84% of the case notes.
4. Discussion regarding Depo-Provera® was recorded in 54% of the case notes.
5. Discussion regarding the failure rate was recorded in 95% of the case notes.
6. Discussion regarding the risk of ectopic pregnancy in cases of failure was recorded in 85% of the case notes.
7. Discussion regarding irreversibility was recorded in 94% of the case notes. However, discussion regarding the reversal procedure and its success rates were only recorded in 1% of the case notes.
8. Advice regarding use of effective contraception until the next period was recorded in 19% of the case notes.

It was concluded that documentation of preoperative counselling for female sterilisation needs to be improved. It was recommended that a ‘tick box’ proforma should be used, and to do a re-audit in 12 months’ time to check whether the introduction of the proforma has resulted in an improvement of documentation.

The female sterilisation procedure is very commonly performed with the potential to attract complaints and litigation. I have a few comments to make regarding the sample proforma that was included in the article.

The Consent Advice 3 of the RCOG recommends that the procedure should be called a laparoscopic tubal occlusion. Moreover, the risk of death (which is 1 in 12 000 procedures performed) should be mentioned. During the preprocedure discussion it is difficult to emphasize the irreversibility of the procedure whilst at the same time talking about the reversal procedures and their success rates.