

1 Vitamin D dose response is underestimated by Endocrine Society's Clinical Practice
2 Guideline

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4 ¹⁻³Malachi J. McKenna,

5 ¹Barbara F. Murray

6 St. Michael's Hospital, Dún Laoghaire¹, Metabolism Laboratory, St. Vincent's University
7 Hospital², and School of Medicine and Medical Sciences, University College Dublin³, Dublin,
8 Ireland.

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16

17 **Abstract**

18 **Objective:** The recommended daily intakes of vitamin D according to the recent Clinical
19 Practice Guideline (CPG) of the Endocrine Society are 3-to-5-fold higher than the Institute of
20 Medicine (IOM) report. We speculated that these differences could be explained by
21 different mathematical approaches to the vitamin D dose response.

22 **Methods:** Studies were selected if the daily dose was ≤ 2000 International Units (IU)/d, the
23 duration exceeded 3 months, and 25-hydroxyvitamin D (25OHD) concentrations were
24 measured at baseline and post-therapy. The rate constant was estimated according to the
25 CPG approach. The achieved 25OHD result was estimated according to: (1) the regression
26 equation approach of the IOM; (2) the regression approach of the Vitamin D
27 Supplementation in Older Subjects (VIDOS) study; and (3) the CPG approach using a rate
28 constant of 2.5 (CPG2.5) and a rate constant of 5.0 (CPG5.0). The difference between the
29 expected and observed 25OHD result was expressed as a percentage of observed, and
30 analysed for significance against a value of 0% for the four groups.

31 **Results:** Forty-one studies were analysed. The mean (CI) rate constant was 5.3(4.4-6.2)
32 nmol/L /100 IU/d, on average 2-fold higher than the CPG rate constant. The mean (CI) for
33 the difference between the expected and observed expressed as a percentage of observed
34 were: (1) IOM, -7(-16,+2)% (t=1.64, p=0.110); (2) VIDOS, +2(-8,+12)% (t=0.40, p=0.69); (3)
35 CPG2.5, -21(-27,-15)% (t=7.2, p<0.0001); and (4) CPG5.0 +3(-4,+10)% (t=0.91, p=0.366).

36 **Conclusion:** The CPG “rule of thumb” should be doubled to 5.0 nmol/L (2.0 ng/ml)/100 IU/d,
37 adopting a more risk-averse position.

38

39 **Introduction**

40 Two conflicting reports on vitamin D intake requirements were published in 2011:
41 Institute of Medicine (IOM) report on *Dietary Reference Intakes for Calcium and Vitamin D*,
42 and the Endocrine Society's Clinical Practice Guideline (CPG) on *Evaluation, Treatment, and*
43 *Prevention of Vitamin D Deficiency*^{1,2}. The IOM, on behalf of the U.S. and Canadian
44 governments, were tasked to review data on calcium and vitamin D intake requirements
45 and their roles in human health¹. The CPG set its objective to provide guidelines to clinicians
46 with a particular emphasis on the care of patients who are at risk for deficiency².

47 IOM specifies an estimated average requirement of 400 IU/d for those with minimal
48 or no sunlight exposure – namely, those at-risk of privational vitamin D deficiency³⁻⁵. CPG
49 recommend an intake for those deemed to be at-risk that is 3-to-5-fold higher at 1500-2000
50 IU/d without any specification about sunlight exposure^{2,6}. CPG considers conditions of risk
51 of vitamin D deficiency in need of augmented intakes, but IOM considers that these
52 individuals are at increased risk if sun-deprived, and are therefore within the realm of the
53 IOM specifications⁵. IOM demonstrated that the evidence of benefit plateaus at 30 to 40
54 nmol/L (12 to 16 ng/ml) and covers the majority at 50 nmol/L (20 ng/ml). CPG claim a
55 25OHD threshold of 75 nmol/L (30 ng/ml) as necessary for bone health. Conceptually, IOM
56 deem a 25OHD concentration as a measure of risk of skeletal disease, but CPG deem a
57 25OHD concentration as diagnostic of “deficiency” or “insufficiency”. Operationally, IOM
58 specify that there is a distribution of requirements called the dietary reference intakes
59 (DRIs) that correspond to 25OHD concentrations: the estimated average requirement (EAR)
60 which corresponds to 40 nmol/L (16 ng/ml), meets the needs of 50 % of the population;

61 and, the recommended daily allowance (RDA), which corresponds to 50 nmol/L (20 ng/ml),
62 meets the needs of all but 97.5% of the population^{1, 4, 7}. CPG designate 75 nmol/L (30
63 ng/ml) as the optimal 25OHD concentration for all.

64 According to the CPG, the vitamin D dose response is best described by a rate
65 constant, or “rule of thumb”, whereby 25OHD is expected to increase by 2.5 nmol/L (1
66 ng/ml) for each 100 IU/d of vitamin D ingested^{2, 8}. IOM noted a curvilinear response
67 between vitamin D intake and 25OHD, as follows: $25\text{OHD nmol/L} = 9.9 * \ln(\text{total vitamin D}$
68 $\text{intake, IU/d})$. In a study of low-dose oral vitamin D intake (800 IU/d) administered to
69 institutionalized elderly for 16 months with severe hypovitaminosis D, we noted a dose
70 response of 9.1 nmol/L (3.6 ng/ml)/100 IU/d, nearly 4-fold higher than the CPG estimate⁹,
71 ¹⁰. Using the IOM regression equation, the predicted mean 25OHD for our study should have
72 been 66 nmol/L (26 ng/ml), which is similar to the observed mean value of 79 nmol/L (31.9
73 ng/ml)¹⁰. We speculated that the CPG approach by underestimating the vitamin D dose
74 response could be a reason for their higher intake specifications.

75 **Methods**

76 We only selected studies that had been compiled from the three major reports on
77 vitamin D: Agency for Health Research Quality (AHRQ)–Ottawa, *Effectiveness and Safety of*
78 *Vitamin D in Relation to Bone Health*¹¹; AHRQ–Tufts, *Vitamin D and Calcium: Systematic*
79 *Review of Health Outcomes*¹²; and, the IOM report¹. Studies were chosen in this way
80 because all studies are described in detail, including a critical appraisal and a grading of
81 quality^{1, 11, 12}. Inclusion criteria for selection of studies were as follows: daily oral dose of
82 vitamin D (D₂ or D₃) ≤ 2,000 IU/d; duration at least 3 months; and results of both baseline
83 and post-therapy 25OHD concentrations.

84 The rate constant for each study was calculated and presented according to the CPG
85 approach of nmol/L rise in 25OHD per 100 IU/d of vitamin D dose. The ratio of observed-to-
86 expected rate constant for each study was calculated. The achieved 25OHD result was
87 estimated according to: (1) the regression equation approach of the IOM; (2) the regression
88 approach of VIDOS ($25\text{OHD nmol/L} = 54.5 + 24.6 * \text{dose}/1000 - 2.5 * \text{dose}^2/1000^2$)¹³; and (3) the
89 CPG approach using a rate constant of 2.5 (CPG2.5) and a rate constant of 5.0 (CPG5.0). The
90 difference between the expected (E) and observed (O) was expressed as a percentage of
91 observed and was calculated as follows for each study: $[(E-O)/O] * 100$.

92 Descriptive statistics are presented as mean and confidence intervals (CIs), as
93 median and interquartile range (IQR), or as number and percentage. A one-sample t test
94 was performed to test whether mean differences, as calculated above, were different from
95 0% for each of the four groups. Statistics were performed using IBM SPSS Stats for Windows
96 Version 20 (Armonk, New York).

97 **Results**

98 Forty-one studies met the selection criteria (Table 1)¹⁴⁻⁵². Studies included young
99 adults (n=3), community-dwelling older adults (n=22) and institutionalized elderly adults
100 (n=16). The majority (n=35) were obtained from AHRQ-Ottawa, and six were identified from
101 AHRQ-Tufts^{16-18, 20, 52}. No additional study was identified in IOM, excluding those studies
102 that were utilized for the simulated vitamin D dose response. Six studies had two sub-
103 groups that were given exactly the same dose; averages of the baseline and post-therapy
104 25OHD concentrations were calculated rather than have duplicate entries^{24, 26, 34, 35, 48, 50}.
105 Thirty-three of the studies were randomized control studies regarding the effect of vitamin
106 D supplementation on 25OHD concentrations.

107 The median (minimum-maximum) dose was 800 (200-2,000) IU/d. The median
108 (minimum-maximum) duration of treatment was 12 (3-60) months. The isoform of
109 administered vitamin D was: vitamin D₂ (n=1); vitamin D₃ (n=33); not specified (n=7). The
110 median (IQR) 25OHD concentration pre-therapy was 39(24-61) nmol/L [16(10-24) ng/ml]
111 and post therapy was 72(61-86) nmol/L [29(24-34) ng/ml].

112 The mean (CI) rate constant was 5.3(4.4-6.2) nmol/L/100 IU/d ranging from 1.1 to
113 12.6 nmol/L/100 IU/d (**Figure 1**). The mean (CI) for the observed:expected ratio of the rate
114 constants with respect to the CPG rate constant of 2.5 nmol/L/100 IU/d was 2.1(1.7-2.5).
115 The mean (CI) for the difference between the expected and observed expressed as a
116 percentage of observed with the result of the one-sample t tests were as follows: (1) for
117 IOM -7(-16,+2)% (t=1.64, p=0.110); (2) for VIDOS +2(-8,+12)% (t=0.40, p=0.69); (3) for CPG
118 using rate constant of 2.5 was -21(-27,-15)% (t=7.2, p<0.0001); and (4) for CPG using rate
119 constant of 5.0 was +3(-4,+10)% (t=0.91, p=0.366) (**Figure 2**).

120 Discussion

121 The CPG approach is an easy to remember “rule of thumb” whereby the clinician
122 calculates the difference between a patient’s 25OHD result and the CPG target of 75 nmol/L
123 (30 ng/ml), then divides that difference by their rate constant of 2.5, and finally multiples
124 the answer by 100 to estimate the required vitamin D dose^{2,8}. According to the findings of
125 our report, this CPG rate constant on average underestimates the rate constant by 2-fold.
126 The reason for the substantial underestimate is explained by the dose response curve for
127 vitamin D. Both IOM and VIDOS noted a curvilinear dose response curve. The CPG rate
128 constant is principally influenced by a dose response study in which the baseline 25OHD
129 concentration approximated 70 nmol/L (28.0 ng/ml) and three high-dose vitamin D

130 schedules were administered, namely 1000 IU/d, 5000 IU/d and 10000 IU/d³¹. When the
131 IOM was deliberating on its approach to vitamin D dose response, it reviewed previous
132 attempts at estimating a rate constant^{11, 31}. IOM noted that lower intakes had a greater
133 response; but they also concluded that if an individual was already taking 1000 IU/d, then
134 the rate constant would be approximately 2.5 nmol/L (1.0 ng/ml)/100 IU/d. Another
135 important factor is the degree of hypovitaminosis D: the lower the 25OHD concentration
136 the greater the response. So the current CPG rate constant should only give an accurate
137 estimate in circumstances when the baseline concentration of 25OHD exceeds 70 nmol/L
138 (28.0 ng/ml) and the intake exceeds 1000 IU/d. Regarding other confounders of the dose
139 response, the VIDOS study demonstrated that body mass index (BMI) was a confounder
140 with 25OHD response being attenuated by increased BMI; also there was an interaction
141 effect between BMI and time¹³. Other covariates had no effect such as age, calcium intake,
142 smoking status, alcohol use, average caffeine intake, and serum creatinine. The IOM report
143 also excluded an interaction effect with age over a broader age range from childhood to the
144 elderly¹.

145 While we demonstrated a very high rate constant in our study of institutionalized
146 patients at 9.1 nmol/L(3.6 ng/ml)/100 IU/d, in a subsequent systematic review of published
147 literature up to 1995 we suggested that the average rate constant was 5.5 nmol/L(2.2
148 ng/ml)/100 IU/d , which is remarkably similar to the current observation⁵³. This fact had
149 been noted and discussed by the authors of the study that formed the basis of the CPG rate
150 constant³¹. The current finding regarding the rate constant is supported by a meta-
151 regression analysis of randomized control trials of vitamin D supplementation (n=51) that
152 has just be published in abstract form⁵⁴. The authors noted a mean increase of 48 nmol/L

153 (19.2 ng/ml) with a daily dose of 800 IU/d after 6 months that is equivalent to a rate
154 constant of 6 nmol/L (2.4 ng/ml)/100 IU/d. Similarly, in a recent systematic review, Autier et
155 al estimated that an intake of 800 IU/d combined with calcium in those with a mean 25OHD
156 level of 25 nmol/L should elevate the level on average by 36 nmol/L, which is equivalent to a
157 rate constant of 4 nmol/L (1.6 ng/ml)/100 IU/d⁵⁵.

158 The regression approach, as used by IOM and VIDOS, is much more satisfactory. Both
159 recommend that one should attempt to estimate the target 25OHD concentration based on
160 either total daily oral vitamin D intake according to IOM, or on dose administered according
161 to VIDOS. The average observed 25OHD concentration was within the confidence limits
162 according to the 25OHD concentration estimated by both the IOM and VIDOS equations,
163 although the confidence intervals are large. The IOM regression equation slightly
164 underestimates the achieved 25OHD concentration, but this is not unexpected since the
165 IOM regression equation is based on total vitamin D intake and the studies only provided
166 information on vitamin D dose, thus underestimating the total oral vitamin D intake.
167 Regarding a similar analysis of the CPG approach, if a rate constant of 5.0 nmol/L (2.0 ng/ml)
168 /100 IU/d is chosen instead of a rate constant of 2.5 nmol/L (1.0 ng/ml) /100 IU/d, then the
169 CPG approach is as good at estimating the 25OHD achieved concentration as both IOM and
170 VIDOS (Figure 2).

171 While classical toxicity occurs at 25OHD concentrations above 250 nmol/L (100
172 ng/ml)², there are concerns about harm at much lower concentrations^{1,56}. There are
173 emerging concerns about risks at serum 25OHD concentrations above 125 nmol/L (50
174 ng/ml)^{1,3}. There is a substantial safety window between 50 nmol/L (20 ng/ml) and 125
175 nmol/L (50 ng/ml). There are now five reasons why the Endocrine Society's CPG could lead

176 to either unnecessary overreplacement for many or hypervitaminosis D with potential harm
177 for some: (1) labelling patients as “deficient” or “insufficient” rather than viewing a 25OHD
178 concentration as a measure of risk, thus heightening concern; (2) setting a higher threshold
179 for 25OHD at 75 nmol/L (30 ng/ml) compared to 50 nmol/L (20 ng/ml) for IOM; (3) advising
180 that all have 25OHD concentrations above the threshold of 75 nmol/L (30 ng/ml), instead of
181 considering that there is a range of requirements like IOM, which specifies that a
182 concentration above 40 nmol/L (16 ng/ml) meets the needs of 50% of the population
183 according to a probabilistic model⁷; (4) failing to distinguish between those “at-risk” for
184 privational hypovitaminosis D, whose intake requirements are covered by IOM
185 specifications, and those “at-risk” for disease-specific reasons; (5) and underestimating the
186 rate constant by 2-fold that is likely to overestimate the intake requirements in those whose
187 concentrations are below 70 nmol/L (28.0 ng/ml) and whose intakes are below 1000 IU/d.

188 One example whereby CPG may lead to toxicity is in infancy. CPG recommends
189 intakes of 400-1000 IU/d for all infants, and 2000 IU/d for 6 weeks for those with
190 concentrations below 50 nmol/L (20 ng/ml)². IOM, due to lack of evidence, only specify an
191 “adequate intake” of 400 IU/d, which is likely to meet the needs of the majority¹. In a
192 recent survey of preterm infants with 25OHD concentrations less than 50 nmol/L (20.0
193 ng/ml) who were followed into infancy at about 3-4 months, we observed that an intake of
194 400 IU/d from feeds and supplements yielded an average 25OHD concentration of 83
195 nmol/L (33 ng/ml). Nearly 10% had concentrations above 125 nmol/L (50 ng/ml), and one
196 infant had a 188 nmol/L (75 ng/ml) who was actually ingesting 850 IU/d, which is within the
197 CPG recommendation⁵⁷. There is a recent case series of infants with hypercalcemia
198 highlighting the problem of oversupplementation⁵⁸. Infants are most at-risk of vitamin D

199 toxicity due mutations in the vitamin D metabolising enzyme CYP24A1 that increases
200 sensitivity to oral vitamin D⁵⁹.

201 IOM has shifted the paradigm from thinking about “more is better” to a more risk
202 averse approach³. It has also challenged the notion that harm should just be viewed in
203 terms of vitamin D toxicity such as hypercalcaemia, hypercalciuria, or metastatic
204 calcification. It has advanced the concept of “harm” in terms of chronic disease outcomes
205 and mortality¹. This viewpoint is further enhanced by more recent reports on links with all-
206 cause mortality and with prostate cancer^{56, 60}. Empiric evidence requires demonstration of
207 harm in the setting of a randomised clinical trial. It may be some time before such evidence
208 is forthcoming, but a recent report from Australia is informative. In a randomised trial of
209 annual high-dose oral vitamin D that had falls and fractures as outcome measures,
210 intervention resulted in increased risk of falls and fractures; in a small sample of the treated
211 group, 25OHD levels reached an average concentration of 120 nmol/L that approximates
212 the upper safe level specified by IOM. It is more risk averse to adopt a stochastic approach
213 of harm, rather than a deterministic approach of toxicity.

214 A limitation of this paper is that the original studies were not reviewed by us, but
215 instead the data was extracted from three major reports. In deference to the AHRQ and
216 IOM process it would not have been possible to emulate the work of the Evidence-based
217 Practice Centers that assimilated nearly 40 years of clinical studies on vitamin D and distilled
218 out those studies that informed their comprehensive assessments. Furthermore, this paper
219 was not designed as a meta-regression analysis. In fact, it started as a clinical observation
220 that the Endocrine Society’s approach to vitamin D dose response was far removed from our
221 clinical and research observations, and was also inclined substantially towards

222 underestimating the vitamin D response. Another limitation of this study is comparing
223 reports that use different models of the vitamin D dose response: a linear model with two
224 curvilinear models.

225 It seems prudent to probe the boundaries of benefit by augmenting vitamin D intake
226 to higher levels in carefully conducted research studies, but clinical practice and clinical
227 guidelines need not leap ahead of the evidence as presented in recent reports from AHRQ,
228 IOM, and the US Preventative Services Task Force^{1, 11, 12, 61, 62}. The way forward is the
229 implementation of IOM recommendations, worldwide, especially given that the new
230 specifications have increased 2-3-fold for children and young adults, and increased by 33%-
231 50% for those over age 50 years compared to the last IOM report in 1997⁶³. We conclude
232 that the CPG advice regarding vitamin D dose to patients, overestimates the rate constant
233 by 2-fold on average. We suggest that the “rule of thumb” of the CPG, if it is to be used,
234 should be doubled to 5.0 nmol/L (2.0 ng/ml)/100 IU/d. This would be more reliable as well
235 as being a more risk-averse approach.

236

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Table 1

Studies of low dose daily vitamin D supplementation drawn for AHRQ-Ottawa report and AHRQ-Tufts report

Study	Country	Group*	Dose (IU/d)	Duration (months)	25OHD nmol/L		Rate constant (nmol/L/100 IU/d)	Expected 25OHD nmol/L			
					Basal	Post		IOM	VIDOS	CPG2.5	CPG5.0
Aloia ¹	USA	2	800	3	48	71	2.0	66	73	68	88
Bischoff-Ferrari ²	Switzerland	3	800	4	31	66	4.4	66	73	51	71
Bjorkman ³	Finland	3	400	6	23	50	6.8	59	64	33	43
Bjorkman ³	Finland	3	1200	6	23	72	4.1	70	80	53	83
Blum ⁴	USA	2	700	12	73	122	7.0	65	70	91	108
Bolton-Smith ⁵	UK	2	400	60	60	72	3.0	59	64	70	80
Brazier ⁶	France	2	800	3	23	65	5.3	66	73	43	63
Bunout ⁷	Chile	2	800	12	40	73	4.1	66	73	60	80
Chapuy ⁸	France	3	800	18	40	105	8.1	66	73	60	80
Chapuy ⁹	France	3	800	24	22	77	6.9	66	73	42	62
Chel ¹⁰	The Netherlands	3	400	4	23	60	9.3	59	64	33	43
Dawson-Hughes ¹¹	USA	2	700	36	77	112	4.1	65	70	95	112
Deroisy ¹²	Belgium	2	200	3	28	43	7.5	52	59	33	38
Deroisy ¹³	Belgium	3	800	12	50	111	9.0	66	73	70	90
Goussos ¹⁴	USA	2	800	3	48	64	2.0	66	73	68	88
Grados ¹⁵	France	2	800	12	18	72	6.8	66	73	38	58
Grant ¹⁶	UK	2	800	60	39	62	2.9	66	73	59	79
Harwood ¹⁷	UK	3	800	12	29	50	2.6	66	73	49	69
Heaney ¹⁸	USA	1	1000	5	72	84	1.8	68	77	97	122
Heikkinen ¹⁹	Finland	2	300	12	28	38	3.3	56	62	36	43
Hunter ²⁰	UK	2	800	24	71	105	4.3	66	73	91	111
Jensen ²¹	USA	2	400	36	41	82	9.0	59	64	51	61
Kenny ²²	USA	2	1000	6	65	87	2.2	68	77	90	115

Kenny ²³	USA	2	400	3	61	71	1.5	59	64	71	81
Komulainen ²⁴	Finland	2	300	6	29	38	3.0	56	62	37	44
Kreig ²⁵	Switzerland	3	880	24	30	66	4.1	67	74	52	74
Lips ²⁶	The Netherlands	2	400	36	27	54	6.8	59	64	37	47
Lips ²⁷	The Netherlands	3	400	12	24	72	12.0	59	64	34	44
Lips ²⁷	The Netherlands	3	800	12	24	85	7.6	66	73	44	64
Lovell ²⁸	Australia	3	230	3	18	47	12.6	54	60	24	29.5
Lovell ²⁸	Australia	3	866	3	41	78	4.3	67	74	63	84.3
Meier ²⁹	Australia	2	500	24	75	88	2.6	62	66	88	100
Ooms ³⁰	The Netherlands	2	400	24	27	62	8.8	59	64	37	47
Orwoll ³¹	USA	2	1000	12	60	85	2.5	68	77	85	110
Patel ³²	UK	1	800	12	68	77	1.1	66	73	88	108
Riis ³³	Denmark	2	2000	12	33	120	4.4	75	94	83	133
Schaafsma ³⁴	The Netherlands	2	400	12	90	125	11.0	59	64	100	110
Sebert ³⁵	Finland	3	800	6	7	35	3.5	66	73	27	47
Sorva ³⁶	Finland	3	1000	9	12	57	4.4	68	77	37	62
Vieth ³⁷	Canada	1	600	6	46	79	5.5	63	68	61	76
Zhu ³⁸	Australia	2	1000	60	68	104	3.6	68	77	93	118

* Groups: 1 = young adults; 2 = community-dwelling older adults and elderly; 3 = institutionalized elderly adults

IOM refers to Institute of Medicine report; VIDOS refers to Vitamin D in Older Subjects study; CPG2.5 refers to Clinical Practice Guideline using rate constant of 2.5 nmol/L/100 IU/d; and CPG5.0 refers to Clinical Practice Guideline using rate constant of 2.5 nmol/L/100 IU/d.

Conversion factor for 25OHD: 1 ng/ml = 2.5 nmol/L.

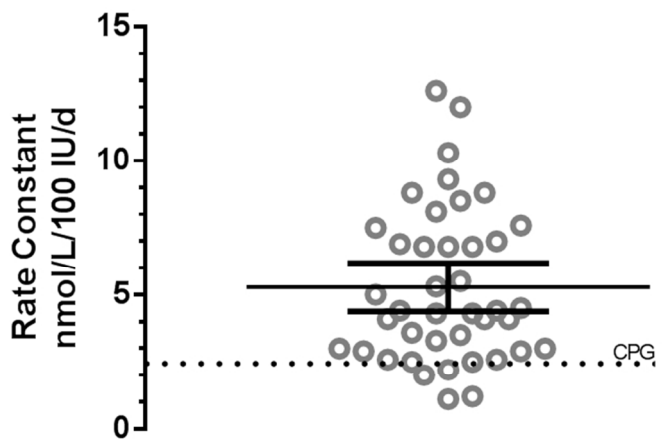


Figure 1. This plot depicts rate constants in the 41 studies. The mean (95% CI) is 5.3 (4.4-6.2) rise of 25OHD nmol/L per vitamin D intake of 100 IU/d. The Clinical Practice Guideline (CPG) rate constant of 2.5 nmol/L/100 IU/d is depicted by the broken line.
254x190mm (96 x 96 DPI)

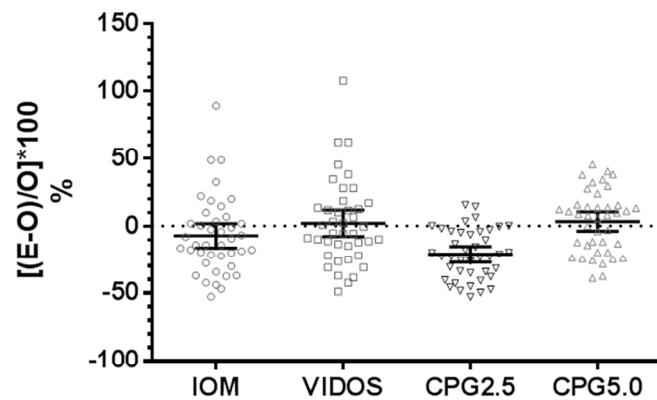


Figure 2. This plot depicts differences between the expected and observed expressed as a percentage of observed in the 41 studies. The mean and 95% CIs are represented by continuous lines. IOM refers to Institute of Medicine report; VIDOS refers to Vitamin D in Older Subjects study; CPG2.5 refers to Clinical Practice Guideline using rate constant of 2.5 nmol/L/100 IU/d; and CPG5.0 refers to Clinical Practice Guideline using rate constant of 5.0 nmol/L/100 IU/d. E = expected 25OHD; O = observed 25OHD.
254x190mm (96 x 96 DPI)