FOOD AND DRUG ADMINISTRATION (FDA)
Center for Drug Evaluation and Research (CDER)

Joint Meeting of the Drug Safety and Risk Management Advisory Committee (DSaRM) and the Anesthetic and Analgesic Drug Products Advisory Committee (AADPAC)
FDA White Oak Campus, Building 31 Conference Center, the Great Room (Rm. 1503)
10903 New Hampshire Avenue, Silver Spring, Maryland
August 3, 2018

DRAFT QUESTIONS

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1. **DISCUSSION:** The intent of the Transmucosal Immediate-Release Fentanyl (TIRF) Risk Evaluation and Mitigation Strategy (REMS) is to mitigate the risk of misuse, abuse, addiction, overdose, and serious complications due to medication errors by:

   Objective 1: Ensuring prescribing and dispensing TIRFs only to appropriate patients (e.g., opioid tolerant patients).

   a. Discuss whether the following strategies will inform if this objective is being met:

      i. Further validation of claims-based algorithm through EMR/chart study

      ii. Linked claims-based outcomes studies in patients prescribed TIRF medicines, comparing opioid non-tolerant patients to opioid tolerant patients

   b. Discuss other strategies the TIRF REMS Industry Group (TRIG) should undertake to inform this objective.

   Objective 2: Preventing inappropriate conversion between TIRF medicines.

   c. Discuss whether the following strategy will inform if this objective is being met:

      i. Further study to obtain dosing instructions for TIRFs dispensed to estimate the number of inappropriate conversions

   d. Discuss other strategies the TRIG should undertake to inform this objective.

   Objective 3: Preventing accidental exposure to children and others for whom it was not prescribed.

   e. Discuss whether the addition of multiple approaches to identify these rare events will inform if this objective is being met.

   f. Discuss other strategies the TRIG should undertake to inform the objective.

Objective 4: Educating prescribers, pharmacists and patients on the potential for misuse, abuse, addiction, and overdose of TIRF medicines.

g. Discuss whether the prescriber, patient, and pharmacy survey results, as well as the requirement for re-certification of prescribers and pharmacists, are sufficient to inform this objective.

h. Discuss other strategies the TRIG should undertake to inform the objective.

2. **DISCUSSION:** The goal of the TIRF REMS is to mitigate the risks of misuse, abuse, addiction, overdose and serious complications due to medication errors. Considering the substantial limitations of the surveillance data, discuss the significance of findings suggestive of increasing rates of adverse events, despite decreasing use of TIRF medicines.

3. **DISCUSSION:** The REMS assessment data indicate the outpatient use of TIRF medicines has decreased approximately 75% since 2010.

   a. Discuss any factors that may have resulted in the decrease in use of TIRF medicines.

   b. Discuss whether the TIRF REMS may be creating unnecessary barriers to access to these products for patients who could benefit from them, and if so, what can be done to reduce these barriers.

   c. Discuss whether there are additional mechanisms to reduce burden to the healthcare system associated with the TIRF REMS.

4. **DISCUSSION:** The TIRF REMS requires that prescribers and pharmacists are educated on the risks and safe use of TIRF medicines prior to prescribing and dispensing, and that patients sign a form acknowledging that they have been made aware of the risks and methods for safe use.

   a. Given the limitations of the assessment data and the limited use of these products, discuss whether the goals and objectives of the TIRF REMS are still appropriate.

   b. If you believe the goals and objectives remain appropriate, is the TIRF REMS adequately designed (i.e., ensuring prescribers, pharmacists and patients are educated) to achieve these goals and objectives.