### Department of Health and Human Services Food and Drug Administration Center for Drug Evaluation and Research Office of Surveillance and Epidemiology Office of Medication Error Prevention and Risk Management INAL RISK EVALUATION AND MITICATION STRATECY (REM

### FINAL RISK EVALUATION AND MITIGATION STRATEGY (REMS) MODIFICATION REVIEW

Date:	June 25, 2015
Reviewers:	Danny Gonzalez, M.S., Pharm.D. Risk Management Analyst DRISK
	Joan E. Blair, R.N., M.P.H. Health Communications Analyst Division of Risk Management (DRISK)
	Donella Fitzgerald, Pharm. D. Risk Management Analyst DRISK
Team Leader:	Kim Lehrfeld, Pharm.D. DRISK
Acting Deputy Division Director	Reema Mehta, Pharm.D, M.P.H. DRISK
Drug Name(s):	See table below
Therapeutic Class:	Opioid Agonist: Extended-Release and Long-Acting Opioid Analgesic Drug Products

Drug Name	Dosage and Route	Application Type/Number	
Avinza (morphine sulfate)	extended-release capsules	NDA 021260	
Butrans (buprenorphine)	transdermal system	NDA 021306	
Dolophine (methadone hydrochloride)	tablets	NDA 006134	
Duragesic (Fentanyl Transdermal System)	transdermal system	NDA 019813	

Embeda (morphine sulfate and naltrexone hydrochloride)	extended-release capsules	NDA 022321	
Exalgo (hydromorphone HCl)	extended-release capsules	NDA 021217	
Hysingla (hydrocodone bitartrate)	extended release tablet	NDA 206627	
Kadian (morphine sulfate)	extended-release capsules	NDA 020616	
MS Contin (morphine sulfate)	controlled-release tablets	NDA 019516	
Methadone	oral solution	ANDA 087997	
Methadone oral solution	oral solution	ANDA 087393	
Methadone	oral concentrate	ANDA 089897	
Nucynta ER (tapentadol)	extended-release oral tablets	NDA 200533	
Opana ER (oxymorphone hydrochloride)	extended-release oral tablets	NDA 201655	
Opana ER (oxymorphone hydrochloride)	extended-release oral tablets	NDA 021610	
Oxycontin (oxycodone hydrochloride)	controlled-release tablets	NDA 022272	
Targiniq (oxycodone hydrochloride and naloxone hydrochloride)	extended-release tablets	NDA 205777	
Zohydro ER (hydrocodone bitartate)	extended-release oral capsules	NDA 202880	
morphine sulfate ER cap	extended-release oral capsules	ANDA 079040	
fentanyl transdermal system	transdermal system	ANDA 077449	
methadone HCL tablet	Tablet	ANDA 040050	
methadone HCL tab	Tablet	ANDA 040517	
morphine sulfate ER tab	extended-release oral tablets	ANDA 076412	

morphine sulfate ER tab	extended-release oral tablets	ANDA 076438
fentanyl transdermal system	transdermal system	ANDA 077154
morphine sulfate ER tab	extended-release oral tablets	ANDA 200824
fentanyl transdermal system	transdermal system	ANDA 076258
fentanyl transdermal system	transdermal system	ANDA 077775
fentanyl transdermal system	transdermal system	ANDA 077062
morphine sulfate ER cap	extended-release oral capsules	ANDA 200812
morphine sulfate ER tab	extended-release oral tablets	ANDA 078761
morphine sulfate ER tab	extended-release oral tablets	ANDA 074769
morphine sulfate ER tab	extended-release oral tablets	ANDA 074862
methadone HCL tablet	tablet	ANDA 040241
methadone HCL tablet	tablet	ANDA 090635
morphine sulfate extended release capsules	extended-release oral capsules	ANDA 202104
morphine sulfate extended-release tablets	extended-release oral tablets	ANDA 075295
fentanyl transdermal system	transdermal system	ANDA 076709
oxymorphone HCl extended-release	extended-release oral tablets	ANDA 200822
hydromorphone HCl extended-release	extended-release oral tablets	ANDA 202144
oxymorphone HCl extended-release	extended-release oral tablets	ANDA 202946
oxymorphone HCl extended-release	extended-release oral tablets	ANDA 079046

oxymorphone HCl extended-release	extended-release oral tablets	ANDA 079087
methadone HCl	oral solution	ANDA 090707
morphine sulfate	extended-release oral ANDA 203849 tablets	
morphine sulfate	extended-release oral tablets	ANDA 77855
morphine sulfate	extended-release oral tablets	ANDA 76720
morphine sulfate	extended-release oral tablets	ANDA 76733
hydromorphone hydrochloride	extended-release oral tablets	ANDA 204278
oxymorphone HCl	extended-release oral tablets	ANDA 200792
oxymorphone HCl	extended-release oral tablets	ANDA 203506
morphine sulfate	extended-release oral capsules	ANDA 202718
fentanyl	controlled-release film	ANDA 202097
methadone HCL tablet	tablet	ANDA 90065
methadone HCL tablet	tablet	ANDA 203502

\*\*\* This document contains proprietary and confidential information that should not be released to the public. \*\*\*

### **1 INTRODUCTION**

The purpose of this review is to document the Division of Risk Management's (DRISK) final review of the proposed modification to the single shared system (SSS) risk evaluation and mitigation strategy (REMS) for the extended-release and long-acting (ER/LA) opioid analgesics, <sup>1</sup> or 'ER/LA opioids', initially received between February 4 - March 5, 2015, and amended with the final documents between June 3 - 24, 2015.

The proposed modifications to the ER/LA Opioid Analgesics REMS (ER/LA REMS) consist of revisions to the ER/LA REMS Blueprint (Blueprint), an ER/LA REMS appended material, to include Hysingla ER (hydrocodone bitartrate)<sup>2</sup>, intermediate doses for fentanyl transdermal systems<sup>3</sup>, and revised Dolophine (methadone hydrochloride)<sup>4</sup> product specific information.

### 1.1 BACKGROUND

The ER/LA REMS includes ER/LA opioid brand name and generic products formulated with the active ingredients: buprenorphine, fentanyl, hydrocodone, hydromorphone, methadone, morphine, oxycodone, oxymorphone, and tapentadol. ER/LA opioids are approved for the management of pain severe enough to require daily, around-the-clock, long-term opioid treatment and for which alternative treatment options are inadequate. Although, all opioid formulations have the potential for misuse, abuse, overdose and death, the Agency believes that ER/LA opioids possess a significant safety concern because they contain more opioid per tablet, capsule, or patch, and either stay in the body longer or are released into the body over longer periods of time. Additionally, when the extended-release features of some of these formulations are manipulated, either deliberately or inadvertently, these products deliver high doses of opioid in an immediate-release manner, potentially resulting in overdose.

As described in DRISK's July 6, 2012 Final REMS review, in accordance with section 505-1 of the FDCA, the Agency determined that a REMS is necessary for ER/LA opioids to ensure that the benefits of the drug continue to outweigh the risks of adverse outcomes (addiction, unintentional overdose, and death) resulting from inappropriate prescribing, abuse, and misuse. Additionally, in the interest of public health and to minimize the burden on the healthcare delivery system of having multiple unique REMS programs, a SSS should be used to implement the REMS for all members of the class.

<sup>&</sup>lt;sup>1</sup> The branded and generic drug products subject to this REMS include *all*: a) extended-release, oral-dosage forms containing: hydromorphone, morphine, oxycodone, oxymorphone, or tapentadol; b) fentanyl and buprenorphine-containing transdermal delivery systems; *and* c) methadone tablets and solutions that are indicated for use as analgesics.

<sup>&</sup>lt;sup>2</sup> For details on the DRISK rationale for the Hysingla ER REMS please refer to Hysingla ER REMS Review submitted on 11/6/2014.

<sup>&</sup>lt;sup>3</sup> For details on the DRISK rationale for the Duragesic intermediate strengths and ER/LA REMS please refer to the Fentanyl Transdermal Systems REMS Review submitted on 11/20/2014 and amended on 12/19/2014.

<sup>&</sup>lt;sup>4</sup> For details on the DRISK rationale for the update to the Dolophine Blueprint please refer to REMS Modification Review submitted on 4/3/2015.

The ER/LA REMS is a SSS and was originally approved on July 9, 2012. The manufacturers of ER/LA opioids are collectively referred to as the REMS Program Companies (RPC). Modifications to the ER/LA Opioid Analgesic REMS were approved on August 28, 2012 and April 15, 2013.

The goal of the ER/LA REMS is to reduce serious adverse outcomes resulting from inappropriate prescribing, misuse, and abuse of ER/LA opioid analgesics while maintaining patient access to pain medications. Adverse outcomes of concern include addiction, unintentional overdose, and death. The ER/LA REMS consists of a Medication Guide (MG), elements to assure safe use (ETASU), and a timetable for submission of assessments of the REMS.

The ETASU includes a training program for prescribers that is not linked to restricted distribution. The tools used to support the ETASU include continuing education (CE) programs by CE providers on the safe use of ER/LA opioids, letters for prescribers and professional organizations to inform them about the program, a patient counseling document, and a REMS website. The timetable for submission of assessments is at 6 months and 12 months after the initial approval date of the REMS (July 9, 2012), and annually thereafter.

### **1.2 REGULATORY HISTORY**

Following is an overview of the regulatory history for the proposed ER/LA REMS Modification since the August 2014 approval of the SSS ER/LA REMS modification.

**November 20, 2014:** FDA approved Hysingla ER (hydrocodone bitartrate extendedrelease tablets), for oral use, CII for the management of pain severe enough to require daily, around-the-clock, long-term treatment and for which alternative treatment options are inadequate. DRISK completed a final review of the modified REMS on November 6, 2014.<sup>5</sup>

**December 29, 2014:** FDA approved intermediate strengths (37.5 mcg/hour, 62.5 mcg/hour, and 87.5 mcg/hour) of fentanyl transdermal systems, for transdermal use, CII for the management of pain severe enough to require daily, around-the-clock, long-term treatment and for which alternative treatment options are inadequate. DRISK completed a final review of the modified REMS on November 20, 2014 and amended this review on December 19, 2014.<sup>6</sup>

**December 29, 2014:** FDA approved morphine sulfate ER capsules, ANDA 202718, with the ER/LA REMS that incorporated both Hysingla ER and fentanyl intermediate strengths. DRISK completed a final review of the ANDA with the modified REMS on December 19, 2014.

**February 3, 2015:** The Agency sent a REMS modification notification letter to the RPC members notifying them of the revised REMS materials reflecting: (1) product-specific

<sup>&</sup>lt;sup>5</sup> For details on the DRISK rationale for the Hysingla ER REMS please refer to Hysingla ER REMS Review submitted on 11/6/2014.

<sup>&</sup>lt;sup>6</sup> For details on the DRISK rationale for the Duragesic intermediate strengths and ER/LA REMS please refer to the Fentanyl Transdermal Systems REMS Review submitted on 11/20/2014 and amended on 12/19/2014.

information for a recently approved ER/LA opioid analgesic, Hysingla ER (hydrocodone bitartrate extended-release) tablets and (2) newly approved intermediate strengths of fentanyl transdermal systems.

**February 4, 2015 - March 5, 2015:** All RPC sponsors submitted the revised ER/LA REMS to their respective applications. Exceptions include ANDA 202718 and ANDA 76258 because these applications included the current ER/LA REMS when approved by the Agency on December 29, 2015.

**March 19, 2015:** The Agency issued an ER/LA REMS Assessment Acknowledgment letter with comments which must be responded to in the next ER/LA REMS Assessment report. This prompted an update to the ER/LA REMS Supporting Document which is discussed below in Section 3.4.<sup>7</sup>

**April 2, 2015:** The Agency approved revised Prescribing Information (PAS-038) for Dolophine (methadone HCl tablets), for oral use, CII for the management of pain severe enough to require daily, around-the-clock, long-term treatment and for which alternative treatment options are inadequate. This approval prompted revisions to the ER/LA REMS Blueprint.

**May 28, 2015:** The Agency advised the RPC, via email, to incorporate changes made to the ER/LA Blueprint for the Dolophine titration-related labeling changes.

**June 3-24 2015:** All RPC sponsors submitted the revised ER/LA REMS to their respective applications.

### 2 MATERIALS INFORMING OUR REVIEW

See the table starting on page one of this review for a complete list of submissions for this REMS modification

### 3 RESULTS OF REVIEW OF THE PROPOSED ER/LA REMS MODIFICATION

### 3.1 RATIONALE FOR THE PROPOSED REMS MODIFICATION

The purpose of the current REMS modification is to include product specific information in the Blueprint for Hysingla ER that was approved with a revised ER/LA REMS following the August 2014 SSS ER/LA REMS modification<sup>2</sup>, to include intermediate doses of fentanyl transdermal systems that was approved with a revised ER/LA REMS following the August 2014 SSS ER/LA REMS modification<sup>3</sup>, and to include revised Dolophine titration information that was approved as a labeling supplement for Dolophine.

<sup>&</sup>lt;sup>7</sup> ER/LA REMS Assessment Acknowledgment letter, issued to all ER/LA REMS Sponsors on March 19, 2015.

### 3.2 PROPOSED REMS MODIFICATIONS

### 3.2.1 Goals

There are no proposed changes to the goals of the REMS.

### 3.2.2 Medication Guide

There are no proposed changes to the MGs for individual products.

### 3.2.3 Elements to Assure Safe Use

### 3.2.3.1 REMS Document

There are no proposed changes to the REMS document.

### **3.2.3.2 REMS Appended Material**

The only proposed change to a REMS appended material is to the Blueprint described below.

### FDA Blueprint for Prescriber Education for ER/LA Opioid Analgesics

- i. Incorporation of product-specific information for a recently approved ER/LA opioid analgesic, Hysingla ER (hydrocodone bitartrate) tablets<sup>2</sup>
- ii. Incorporation of newly approved intermediate strengths of fentanyl transdermal systems<sup>3</sup>
- iii. Incorporation of revised titration information for Dolophine (methadone hydrochloride)<sup>5</sup>

### 3.2.4 Timetable for Submission of Assessments

There are no proposed changes to the Timetable for Submission of Assessments.

### 3.3 REMS Assessment Plan

There are no proposed changes to the REMS Assessment Plan.

### 3.4 REMS SUPPORTING DOCUMENT

As a result of the ER/LA REMS Assessment Acknowledgment letter, issued on March 19, 2015, the ER/LA REMS Supporting Document was revised by the RPC to reflect how they will present data in the next scheduled Assessment report. The Assessment Plan did not change. DRISK agrees with the changes to this document.

### 4 DISCUSSION AND CONCLUSION

DRISK finds the proposed REMS modification for the ER/LA Opioid Analgesics REMS, as submitted between June 3-24, 2015, acceptable. The timetable for submission of assessments of the REMS and the REMS assessment plan will remain the same as that approved on July 9, 2012. Therefore, the modified ER/LA Opioid Analgesic REMS is

acceptable to the Office of Surveillance and Epidemiology (OSE), Office of Medication Error and Prevention and Risk Management (OMEPRM), DRISK.

### **5 RECOMMENDATIONS**

The OSE, OMEPRM, DRISK recommends approval of the REMS Modification for ER/LA Opioid Analgesic REMS received June 3-24, 2015 and appended to this review. The Approval Letter should reference the REMS assessment plan included with the July 9, 2012 REMS approval.

### ATTACHMENTS

1. REMS Document and REMS appended materials

Initial REMS Approval: 07/2012 Most Recent Modification: XX/XXXX

### EXTENDED-RELEASE (ER) AND LONG-ACTING (LA) OPIOID ANALGESICS RISK EVALUATION AND MITIGATION STRATEGY (REMS)

#### GOAL

The goal of this REMS is to reduce serious adverse outcomes resulting from inappropriate prescribing, misuse, and abuse of extended-release or long-acting (ER/LA) opioid analgesics while maintaining patient access to pain medications. Adverse outcomes of concern include addiction, unintentional overdose, and death.

#### I. REMS ELEMENTS

#### A. Medication Guide

A Medication Guide will be dispensed with each ER/LA opioid analgesic prescription in accordance with 21 CFR § 208.24.

The Medication Guides for ER/LA opioids are part of the ER/LA Opioid Analgesic REMS program and will be available through the ER/LA Opioid Analgesic REMS website <u>www.ER-LA-opioidREMS.com</u>.

#### B. Elements to Assure Safe Use

- Training will be made available to healthcare providers who prescribe ER/LA opioid analgesics.
  - a. Training will be considered "REMS-compliant training" under this REMS if: 1) it, for training provided by CE providers, is offered by an accredited provider to licensed prescribers, 2) it includes all elements of the FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics ("FDA Blueprint"), 3) it includes a knowledge assessment of all of the sections of the FDA Blueprint, and 4) it is subject to independent audit to confirm that conditions of the REMS training have been met.
  - b. The NDA/ANDA holders of ER/LA opioid analgesic products ("NDA/ANDA holders") will ensure that REMS-compliant training is made available to prescribers of ER/LA opioid analgesics and will achieve the following performance goals:
    - Not later than March 1, 2013, the first REMS-compliant training will be made available.
    - Within two years from the time the first REMS-compliant training becomes available, 80,000 prescribers (based on 25% of the 320,000 active prescribers in 2011) will have been trained;
    - iii. Within three years from the time the first REMS-compliant training becomes available, 160,000 prescribers (based on 50% of the 320,000 active prescribers in 2011) will have been trained;
    - Within four years from the time the first REMS-compliant training becomes available, 192,000 prescribers (based on 60%)

of the 320,000 active prescribers in 2011) will have been trained.

- c. The content of the REMS-compliant training will be based on the learning objectives established by the <u>FDA Blueprint</u>. The FDA Blueprint contains core messages to be conveyed to prescribers in the training about the risks and appropriate prescribing practices for the safe use of ER/LA opioid analgesics. The NDA/ANDA holders will direct providers of REMS-compliant training to the FDA Blueprint, via the REMS website (<u>www.ER-LA-opioidREMS.com</u>), and via its Request for Grant Applications. No less than annually, NDA/ANDA holders will direct providers of REMS-compliant training to consult the FDA Blueprint for possible revisions (e.g., changes to the drug specific information).
- NDA/ANDA holders will ensure that independent audits of the educational materials used by the providers of REMS-compliant training are conducted. The audits must:
  - Be conducted by an auditor independent of the NDA/ANDA holders. (Accreditation bodies of CE providers would be considered independent of the NDA/ANDA holders and would be eligible to conduct the audits.)
  - ii. Evaluate:
    - whether the content of the training covers all components of the <u>FDA Blueprint</u> approved as part of the REMS;
    - 2. whether the knowledge assessment measures knowledge of all sections of the FDA Blueprint; and
    - 3. for training conducted by CE providers, whether the training was conducted in accordance with the standards for CE of the Accreditation Council for Continuing Medication Education<sup>®</sup> (ACCME<sup>®</sup>), or of another CE accrediting body appropriate to the prescribers' medical specialty or healthcare profession.
  - iii. Be conducted on a random sample of 1) at least 10% of the training funded by the NDA/ANDA holders, and 2)
     REMS-compliant training not funded by the NDA/ANDA holders but that will be counted towards meeting the performance goals in section <u>B.1.b.</u>
- e. To facilitate prescriber awareness of the availability of the REMS and REMS-compliant training, within 30 calendar days of the approval of the REMS, the NDA/ANDA holders will make available, and then

		ain a web site that will contain information about the REMS ied below (www.ER-LA-opioidREMS.com):	
	ii.	A current list of the REMS-compliant training that is supported by educational grants from the NDA/ANDA holders, when this information becomes available. A copy of the Patient Counseling Document (PCD) on Extended-Release/Long-Acting Opioid Analgesics. A copy of the Prescriber Letters 1, 2, and 3 (when mailed and for at least one year thereafter) (see section B.1.f).	
f	prescri NDA/ directl	ke prescribers aware of the existence of the REMS and the iber training that will be made available under the REMS, the ANDA holders will electronically deliver (email or fax), or ly mail letters to all DEA-registered prescribers who are ered to prescribe Schedule II and III drugs:	
	i.	<u>Prescriber Letter 1</u> will be sent not later than 60 days after the initial approval of this REMS, notifying prescribers of the existence of the REMS and the fact that prescriber training will be offered, and providing a copy of the <u>Patient Counseling Document (PCD)</u> .	
	ii.	<u>Prescriber Letter 2</u> will be sent not later than 30 days before the first prescriber REMS-compliant training required by the REMS is offered by providers and will notify prescribers of the imminent upcoming availability of accredited REMS CE courses.	
	iii.	The prescribers will be identified via the DEA Registration Database.	
	iv.	At least annually from the date of initial approval of the REMS, the DEA Registration Database will be reviewed and <u>Prescriber</u> <u>Letter 3</u> will be sent to all newly DEA-registered prescribers who are registered to prescribe Schedule II and III drugs to inform them of the existence of the REMS, provide them the <u>Patient Counseling Document (PCD)</u> , and notify them of the availability of the REMS-compliant training and how to find REMS-compliant courses.	
٤	ER/LA be made electro letters listed i	ther ensure that prescribers are aware of the existence of the A Opioid Analgesic REMS and the prescriber training that will de available under the REMS, the NDA/ANDA holders will onically deliver (email or fax), or directly mail the following two to the professional organizations and state licensing entities in section <u>B.1.g.iii</u> with a request that the information be ninated to their members: 4	

i.	Professional Organization/Licensing Board Letter 1 will be sent
	not later than 60 days after the approval of this REMS,
	notifying prescribers of the existence of the REMS and the fact
	that prescriber training will be offered, and providing a copy of
	the Patient Counseling Document (PCD) on
	Extended-Release/Long-Acting Opioids.
ii.	Professional Organization/Licensing Board Letter 2 will be sent

- not later than 30 days before the first prescriber REMScompliant training required by the REMS is offered by providers and will notify prescribers of the imminent upcoming availability of accredited REMS CE courses.
- iii. The letter and enclosures referenced above, will be sent to the following entities:
  - a) State Licensing Boards of:
    - 1) Medicine (allopathic and osteopathic)
    - 2) Nursing
    - 3) Dentistry
  - b) Associations of State Licensing Boards:
    - 1) Federation of State Medical Boards
    - 2) National Council of State Boards of Nursing
    - 3) American Association of Dental Boards
  - c) Learned Societies and Professional Associations, including, but not limited to:
    - 1) American Academy of Addiction Psychiatry
    - 2) American Academy of Family Physicians
    - 3) American Academy of Hospice and Palliative Medicine
    - 4) American Academy of Neurology
    - 5) American Academy of Nurse Practitioners
    - 6) American Academy of Nursing
    - 7) American Academy of Orofacial Pain
    - 8) American Academy of Pain Management
    - 9) American Academy of Pain Medicine
    - 10) American Academy of Physical Medicine and Rehabilitation
    - 11) American Academy of Physician Assistants

12) American Association of Colleges of Osteopathic Medicine
13) American Association of Colleges of Nursing
14) American Association of Poison Control Centers
15) American Board of Medical Specialties
16) American Board of Orofacial Pain
17) American College of Nurse Practitioners
18) American College of Osteopathic Family Physicians
19) American College of Physicians
20) American College of Rheumatology
21) American Dental Association
22) American Dental Education Association
23) American Medical Association
24) American Medical Directors Association
25) American Nurses Association
26) American Nurses Credentialing Center
27) American Osteopathic Association
28) American Osteopathic Association of Addiction Medicine
29) American Pain Society
30) American Society of Addiction Medicine
31) American Society for Pain Management Nursing
32) American Society of Anesthesiologists
33) American Society of Pain Educators
34) Association of American Medical Colleges
35) Council of Medical Specialty Societies
36) Hospice and Palliative Nurses Association
37) National Association of Managed Care Physicians
38) National Association of State Controlled Substances Authorities
39) National Commission on Certification of Physician Assistants
40) National Hospice and Palliative Care Organization
41) American College of Emergency Physicians

42) Society of Emergency Medicine Physician Assistants

h. NDA/ANDA holders will ensure that an interim single toll-free number call center is implemented no later than July 23, 2012, and a fully operational centralized call center is implemented no later than 90 calendar days after the approval of the REMS.

The following materials are part of the ER/LA Opioid Analgesic REMS and are appended:

- Patient Counseling Document (PCD) on Extended-Release/Long-Acting Opioid Analgesics
- FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics
- Prescriber Letter 1
- Prescriber Letter 2
- Prescriber Letter 3
- Professional Organization/Licensing Board Letter 1
- Professional Organization/Licensing Board Letter 2
- ER/LA Opioid Analgesic REMS website (www.ER-LA-opioidREMS.com)

#### **II. Implementation System**

The ER/LA Opioid Analgesic REMS can be approved without the Elements to Assure Safe Use specifically described under FDCA 505-1(f)(3) (B), (C), and (D) of the Act; therefore an implementation system is not required.

#### III. Timetable for Submission of Assessments

REMS assessments will be submitted to the FDA at 6 months and 12 months after the initial approval date of the REMS (July 9, 2012), and annually thereafter. To facilitate inclusion of as much information as possible, while allowing reasonable time to prepare the submission, the reporting interval covered by each assessment will conclude no earlier than 60 days before the submission date for that assessment. The NDA holders will submit each assessment so that it will be received by the FDA on or before the due date based on the initial approval date of the REMS.

#### Patient Counseling Document (PCD)

#### Patient Counseling Document on Extended-Release / Long-Acting Opioid Analgesics

Patient Name:

#### The <u>DOs</u> and <u>DON'Ts</u> of

## Extended-Release / Long - Acting Opioid Analgesics

<u>)0:</u>

- Read the Medication Guide
- Take your medicine exactly as prescribed
- Store your medicine away from children and in a safe place
- Flush unused medicine down the toilet
- Call your healthcare provider for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088.

#### Call 911 or your local emergency service right away if:

- · You take too much medicine
- You have trouble breathing, or shortness of breath
- · A child has taken this medicine

#### Talk to your healthcare provider:

- If the dose you are taking does not control your pain
- About any side effects you may be having
- About all the medicines you take, including over-thecounter medicines, vitamins, and dietary supplements

#### DON'T:

- Do not give your medicine to others
- Do not take medicine unless it was prescribed for you
- Do not stop taking your medicine without talking to your healthcare provider
- Do not cut, break, chew, crush, dissolve, snort, or inject your medicine. If you cannot swallow your medicine whole, talk to your healthcare provider.
- Do not drink alcohol while taking this medicine

For additional information on your medicine go to: dailymed.nlm.nih.gov

#### Patient Counseling Document on Extended-Release / Long-Acting Opioid Analgesics

Patient Name:

Patient Specific Information

# Take this card with you every time you see your healthcare provider and tell him/her:

- Your complete medical and family history, including any history of substance abuse or mental illness
- If you are pregnant or are planning to become pregnant
- · The cause, severity, and nature of your pain
- · Your treatment goals
- All the medicines you take, including over-thecounter (non-prescription) medicines, vitamins, and dietary supplements
- · Any side effects you may be having

Take your opioid pain medicine exactly as prescribed by your healthcare provider.

#### Introduction for the FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics

In April 2011, FDA announced the elements of a Risk Evaluation and Mitigation Strategy (REMS) to ensure that the benefits of extended-release and long-acting (ER/LA) opioid analgesics outweigh the risks. The REMS supports national efforts to address the prescription drug abuse epidemic.

As part of the REMS, all ER/LA opioid analgesic companies must provide:

- Education for prescribers of these medications, which will be provided through accredited continuing education (CE) activities supported by independent educational grants from ER/LA opioid analgesic companies.
- Information that prescribers can use when counseling patients about the risks and benefits of ER/LA opioid analgesic use.

FDA developed core messages to be communicated to prescribers in the Blueprint for Prescriber Education (FDA Blueprint), published the draft FDA Blueprint for public comment, and considered the public comments when finalizing the FDA Blueprint. This final FDA Blueprint contains the core educational messages. It is approved as part of the ER/LA Opioid Analgesic REMS and will remain posted on the FDA website for use by CE providers to develop the actual CE activity. A list of all REMS-compliant CE activities that are supported by independent educational grants from the ER/LA opioid analgesic companies to accredited CE providers will be posted at www.ER-LA-opioidREMS.com as that information becomes available.

The CE activities provided under the FDA Blueprint will focus on the safe prescribing of ER/LA opioid analgesics and consist of a core content of about three hours. The content is directed to prescribers of ER/LA opioid analgesics, but also may be relevant for other healthcare professionals (e.g., pharmacists). The course work is not intended to be exhaustive nor a substitute for a more comprehensive pain management course.

Accrediting bodies and CE providers will ensure that the CE activities developed under this REMS will be in compliance with the standards for CE of the Accreditation Council for Continuing Medical Education (ACCME)<sup>1,2</sup> or another CE accrediting body as appropriate to the prescribers' medical specialty or healthcare profession.

For additional information from FDA, including more detailed Questions and Answers about the REMS for ER/LA Opioid Analgesics, see http://www.fda.gov/Drugs/DrugSafety/InformationbyDrugClass/ucm163647.htm.

<sup>1</sup>Accreditation Council for Continuing Medical Education. 2015. <u>Accreditation Requirements. Criteria for CME Providers-Accreditation</u> <u>Criteria</u>. Accessed on May 29, 2015. <sup>2</sup>Accreditation Council for Continuing Medical Education. 2015. <u>Accreditation Requirements. Criteria for CME Providers-Standards</u> for Commercial Support. Accessed on May 29, 2015.

#### FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics

#### Why Prescriber Education is Important

Health care professionals who prescribe extended-release (ER) and long-acting (LA) opioid analgesics (hereafter referred to as ER/LA opioid analgesics) are in a key position to balance the benefits of prescribing ER/LA opioid analgesics to treat pain against the risks of serious adverse outcomes including addiction, unintentional overdose, and death. Opioid misuse and abuse, resulting in injury and death, has emerged as a major public health problem.

- Based on the 2010 National Survey on Drug Use and Health, public health experts estimate more than 35 million Americans age 12 and older used an opioid analgesic for non-medical use some time in their life—an increase from about 30 million in 2002.<sup>3</sup>
- In 2009, there were nearly 343,000 emergency department visits involving nonmedical use of opioid analgesics.<sup>4</sup>
- In 2008, nearly 36,500 Americans died from drug poisonings, and of these, nearly 14,800 deaths involved opioid analgesics.<sup>5</sup>
- Improper use of any opioid can result in serious side effects including overdose and death, and this risk can be greater with ER/LA opioid analgesics.

Appropriate prescribing practices and patient education are important steps to help address this public health problem. Health care professionals who prescribe ER/LA opioid analgesics have a responsibility to help ensure the safe and effective use of these drug products. ER/LA opioid analgesics should be prescribed only by health care professionals who are knowledgeable in the use of potent opioids for the management of pain.

The expected results of the prescriber education in this REMS are that the prescribers will:

- a. Understand how to assess patients for treatment with ER/LA opioid analgesics.
- Be familiar with how to initiate therapy, modify dose, and discontinue use of ER/LA opioid analgesics.
- c. Be knowledgeable about how to manage ongoing therapy with ER/LA opioid analgesics.
- d. Know how to counsel patients and caregivers about the safe use of ER/LA opioid analgesics, including proper storage and disposal.
- Be familiar with general and product-specific drug information concerning ER/LA opioid analgesics.

#### I. Assessing Patients for Treatment with ER/LA Opioid Analgesic Therapy

- Prescribers should consider risks involved with ER/LA opioid analgesics and balance these against potential benefits. Risks include:
  - Overdose with ER/LA formulations, as most dosage units contain more opioid than immediate-release formulations.

<sup>3</sup>Substance Abuse and Mental Health Services Administration. 2011. Results from the 2010 National Survey on Drug Use and Health: Detailed Table, Table 7.1.a. Rockville, MD.

http://www.samhsa.gov/data/NSDUH/2k10NSDUH/labs/Sect7peTabs1to45.htm#Tab7.1A. Accessed on May 29, 2015. <sup>4</sup>Substance Abuse and Mental Health Services Administration. 2011. *Drug Abuse Warning Network, 2009: National Estimates of Drug-Related Emergency Department Visits*, Table 19. Rockville, MD. http://www.samhsa.gov/data/2k11/DAWN/2k9DAWNED/HTML/DAWN2k9ED.htm#Tab19. Accessed on May 29, 2015.

<sup>5</sup>Warner M, Chen LH, Makuc DM, Anderson RN, and Miniño AM. 2011. Drug Poisoning Deaths in the United States, 1980–2008, in U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Health Statistics, NCHS Data Brief, No 81. December 2011. Hyattsville, MD. <u>http://www.cdc.gov/nchs/data/databriefs/db81.pdf</u>. Accessed on May 29, 2015.

	ii. Life-threatening respiratory depression
	iii. Abuse by patient or household contacts.
	iv. Misuse and addiction.
	v. Physical dependence and tolerance.
	<ul> <li>Interactions with other medications and substances (See <u>table in Section VI</u> for specific information).</li> </ul>
	<li>vii. Risk of neonatal opioid withdrawal syndrome with prolonged use during pregnancy.</li>
	viii. Inadvertent exposure/ingestion by household contacts, especially children.
b.	Prescribers should assess each patient's risk of abuse, including substance use and psychiatric history. Prescribers should:
	i. Obtain a complete history and conduct a complete physical examination. The
	history should include assessment for a family history of substance abuse and psychiatric disorders, as well as special considerations regarding dose and
	<ul> <li>adverse effects in geriatric patients, pregnant women, and children.</li> <li>A history of substance abuse does not prohibit treatment with ER/LA opioid analgesics but may require additional monitoring and expert consultation.</li> </ul>
	ii. Be knowledgeable about risk factors for opioid abuse.
	iii. Understand and appropriately use screening tools for addiction or abuse to help
	assess potential risks associated with chronic opioid therapy and to help manage
	patients using ER/LA opioid analgesics (e.g., structured interview tools). iv. Adequately document all patient interactions and treatment plans.
c	Prescribers should understand when to appropriately refer high risk patients to pain
0.	management specialists.
d.	Prescribers should understand opioid tolerance criteria as defined in the product labeling.
	<ul> <li>Prescribers should know which products and which doses are indicated for use only in opioid tolerant patients. (See <u>table in Section VI</u> for specific information).</li> </ul>
ll. Init	iating Therapy, Modifying Dosing, and Discontinuing Use of ER/LA Opioid Analgesics
a.	Prescribers should have awareness of federal and state regulations on opioid prescribing.
b.	Prescribers should be aware that: i. Dose selection is critical, particularly when initiating therapy in opioid non-tolerant
	patients.
	ii. Some ER/LA opioid analgesics are only appropriate for opioid-tolerant patients.
	Opioid-tolerance is defined as follows: patients receiving, for one week or longer, at least 60 mg oral morphine/day, 25 mcg transdermal fentanyl/hour, 30
	mg oral oxycodone/day, 8 mg oral hydromorphone/day, 25 mg oral
	oxymorphone/day, or an equianalgesic dose of another opioid.
	iii. Dosage should be individualized in every case.
	iv. Titration should be based on efficacy and tolerability.
C.	Prescribers should be knowledgeable about when and how to supplement pain
្ត	management with immediate-release analgesics, opioids and non-opioids.
d.	Prescribers should be knowledgeable about converting patients from immediate-release to ER/LA opioid products and from one ER/LA opioid product to another ER/LA opioid product.
0	Prescribers should understand the concept of incomplete cross-tolerance when converting
С.	patients from one opioid to another.
f	Prescribers should understand the concepts and limitations of equianalgesic dosing and
	follow patients closely during all periods of dose adjustments.

g.	Prescribers should understand the warning signs and symptoms of significant respiratory depression from opioids and monitor patients closely, especially at the time of treatment
	initiation and dose increases
h.	Prescribers should understand that tapering the opioid dose is necessary to safely
	discontinue treatment with ER/LA opioid analgesics when therapy is no longer needed.
Ма	naging Therapy with ER/LA Opioid Analgesics
а	Prescribers should establish analgesic and functional goals for therapy and periodically
••••	evaluate pain control, functional outcomes, side-effect frequency and intensity, and health-
	related quality of life.
b.	Prescribers should be aware of the existence of Patient Prescriber Agreements (PPAs).
ω.	<ul> <li>PPAs are documents signed by both prescriber and patient at the time an opioid is prescribed.</li> </ul>
	ii. PPAs can help ensure patients and caregivers understand the goals of treatment,
	the risks, and how to use the medications safely. iii. PPAs can include commitments to return for follow-up visits, to comply with
	appropriate monitoring (such as random drug testing), and to safeguard the
	medication.
C.	Prescribers should monitor patient adherence to the treatment plan, especially with regard
	to misuse and abuse by:
	i. Recognizing, documenting, and addressing aberrant drug-related behavior.
	ii. Utilizing state Prescription Drug Monitoring Programs, where practical, to identify
	behaviors that may represent abuse. iii. Understanding the utility and interpretation of drug testing (e.g., screening and
	confirmatory tests), and using it as indicated.
	iv. Screening and referring for substance abuse treatment as indicated.
	v. Performing medication reconciliation as indicated.
d.	Prescribers should understand how to anticipate and manage adverse events associated
	with ER/LA opioid analgesics.
e.	Prescribers should be aware that there are no adequate and well-controlled studies of
	ER/LA opioid analgesics in pregnant women. ER/LA opioid analgesics should be used
	during pregnancy only if the potential benefit justifies the risk to the fetus.
f.	Prescribers should be aware of the pregnancy status of their patients. If opioid use is
	required for a prolonged period in a pregnant woman, prescribers should advise the
	patient of the risk of neonatal opioid withdrawal syndrome and ensure that appropriate
	treatment will be available.
g.	Prescribers treating patients with ER/LA opioid analgesics should periodically assess
	benefits and side effects of these drugs, and the continued need for opioid analgesics.
h.	Prescribers should understand the need for reevaluation of patient's underlying medical
	condition if the clinical presentation changes over time.
١.	Prescribers should be familiar with referral sources for the treatment of abuse or addiction
	that may arise from the use of ER/LA opioid analgesics.
Co	unseling Patients and Caregivers about the Safe Use of ER/LA Opioid Analgesics
а	Prescribers should use the Patient Counseling Document as part of the discussion when
ч.	prescribing opioid analgesics.
	Learning chiefe entering and

Prescribers should explain how to take the ER/LA opioid analgesic as prescribed. Prescribers should explain the importance of adherence to dosing regimen, how to handle missed doses, and to contact their prescriber should pain not be controlled. Prescribers should inform patients and caregivers to read the specific ER/LA opioid analgesic be broken, chewed or crushed, and patches should not be cut or torn prior to us as this may lead to rapid release of the ER/LA opioid analgesic causing overdose and death. When a patient cannot swallow a capsule whole, prescribers should refer to the product labeling to determine if it is appropriate to sprinkle the contents of a capsule on applesauce or administer via a feeding tube. Prescribers should caution patients that the use of other CNS depressants such as sedative-hypnotics and axiolytics, alcohol, or illegal drugs with ER/LA opioid analgesics can cause overdose and death. Patients should be instructed to only use other CNS depressants, including other opioids, under the instruction of their prescriber. Prescribers should caution patients to tell all of their doctors about all medications they are taking. Prescribers should caution patients that ER/LA opioid analgesics can cause serious side effects that can lead to death, even when used as recommended. Prescribers should counsel patients and caregivers on the risk factors, signs, and symptoms of overdose and opioid-induced respiratory depression, gastrointestinal obstruction, and allergic reactions. Prescribers should counsel patients and caregivers on the most common side effects. Prescribers should counsel patients to store their ER/LA opioid analgesics with others may cause them to have serious side effects including death, and that selling or giving away ER/LA opioid analgesic is against the law. Prescribers should counsel patients to store their ER/LA opioid analgesics with others may cause them to have serious side effects including death, and that selling or giving away ER/LA opioid an	b.	Prescribers should explain product-specific information about the prescribed ER/LA opioid analgesic.
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can be misused and abused.		can be misused and abused.

- FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics XX/XXXX
- b. Respiratory depression is the most important serious adverse effect of opioids as it can be immediately life-threatening.
- c. Constipation is the most common long-term side effect and should be anticipated.
- d. Drug-drug interaction profiles vary among the products. Knowledge of particular opioid-drug interactions, and the underlying pharmacokinetic and pharmacodynamic mechanisms, allows for the safer administration of opioid analgesics.
  - Central nervous system depressants (alcohol, sedatives, hypnotics, tranquilizers, tricyclic antidepressants) can have a potentiating effect on the sedation and respiratory depression caused by opioids.
  - Some ER opioid formulations may rapidly release opioid (dose dump) when exposed to alcohol. Some drug levels may increase without dose dumping when exposed to alcohol. See individual product labeling.
  - Using opioids with monoamine oxidase inhibitors (MAOIs) may result in possible increase in respiratory depression. Using certain opioids with MAOIs may cause serotonin syndrome.
  - Opioids can reduce the efficacy of diuretics by inducing the release of antidiuretic hormone (ADH).
  - v. Some opioids (methadone, buprenorphine) can prolong the QTc interval.
  - Vi. Concomitant drugs that act as inhibitors or inducers of various cytochrome P450 enzymes can result in higher or lower than expected blood levels of some opioids. (See <u>table in Section VI</u> for specific information).
- e. Tolerance to sedating and respiratory-depressant effects of opioids is critical to the safe use of certain products, certain dosage unit strengths, or certain doses of some products.
  - i. Patients must be opioid tolerant before using any strength of
  - Transdermal fentanyl, or
  - ER hydromorphone.
  - ii. For other ER products, patients must be opioid tolerant before using
  - Certain strengths, or
  - Certain daily doses.
  - iii. See table in Section VI for specific information.
- f. ER/LA opioid analgesic tablets must be swallowed whole. ER/LA opioid analgesic capsules should be swallowed intact or when necessary, the pellets from some capsules can be sprinkled on applesauce and swallowed without chewing.
- g. For transdermal products, external heat, fever, and exertion can increase absorption of the opioid, leading to fatal overdose. Transdermal products with metal foil backings are not safe for use in MRIs.
- h. Follow the instructions for conversion in the Dosage and Administration section (2.1) in the *Prescribing Information* of each product when converting patients from one opioid to another.

#### VI. Specific Drug Information for ER/LA Opioid Analgesic Products

Prescribers should be knowledgeable about specific characteristics of the ER/LA opioid analgesic products they prescribe, including the drug substance, formulation, strength, dosing interval, key instructions, specific information about conversion between products where available, specific drug interactions, use in opioid-tolerant patients, product-specific safety concerns, and relative potency to morphine. The attached table is a reference. For detailed information, prescribers can refer to prescribing information available online via DailyMed at www.dailymed.nlm.nih.gov or Drugs@FDA at www.fda.gov/drugsatfda.

A	mmon to the Class of Extended-Release and Long-Acting Opioid Analgesics (ER/LA opioid analgesics)
Hysingla ER (hydrocodo MS Contin (morphine su Opana ER (oxymorphon	CI tablets)       Duragesic (fentanyl transdermal system)         ER-naltrexone capsules)       Exalgo (hydromorphone HCI ER tablets)         e bitartrate ER tablets)       Kadian (morphine sulfate ER capsules)         ate ER tablets)       Nucynta ER (tapentadol HCI ER tablets)
Dosing Interval	Refer to individual product information.
Key Instructions	<ul> <li>Limitations of usage:         <ul> <li>Reserve for use in patients for whom alternative treatment options (e.g., non-opioid analgesics or immediate-release opioids) are ineffective, not tolerated, or would be otherwise inadequate to provide sufficient management of pain.</li> <li>Not for use as an as-needed analgesic.</li> <li>Not for use as an as-needed analgesic.</li> <li>Not for use in reating acute pain.</li> </ul> </li> <li>Individually titrate to a dose that provides adequate analgesia and minimizes adverse reactions.</li> <li>The times required to reach steady-state plasma concentrations are product specific; refer to product information for titration interval.</li> <li>Continually revaluate to assess the maintenance of pain control and the emergence of adverse reactions.</li> <li>During chronic therapy, especially for non-cancer-related pain, periodically reassess, attempt to identify the source, while adjusting the dose.</li> <li>When an ER/LA opioid analgesic is no longer required, gradually titrate downward to prevent signs and symptoms of withdrawal in the physically-dependent patient. Do not abruptly discontinue these products.</li> <li>Solid oral dosage forms:         <ul> <li>Swallow tablets and capsules whole: crushing, chewing, breaking, cutting or dissolving may result in rapid release and absorption of a potentially fatal dose of opioid.</li> <li>Some capsules can be opened and pellets sprinkled on applesauce for patients who can reliably swallow without chewing and used immediately. See individual product information.</li> </ul> </li> </ul>
	<ul> <li>Exposure of some products to alcoholic beverages or medications containing alcohol may result in the rapid release and absorption of a potentially fatal dose of opioid.</li> <li>Dispose of unused product by flushing down the toilet.</li> <li>Transdermal dosage forms: <ul> <li>Avoid exposure to external heat. Patients with fever must be</li> </ul> </li> </ul>
	<ul> <li>monitored for signs or symptoms of increased opioid exposure.</li> <li>Location of application must be rotated.</li> <li>Prepare skin by clipping, not shaving hair, and washing area only with water.</li> <li>See individual product information for the following: <ul> <li>Dosage reduction for hepatic or renal impairment.</li> </ul> </li> </ul>

Drug Information Common to the Class of Extended-Release and Long-Acting Opioid Analgesics (ER/LA opioid analgesics)		
Drug Interactions Common to the Class	<ul> <li>Concurrent use with other central nervous system depressants (sedatives, hypnotics, general anesthetics, antiemetics, phenothiazines, other tranquilizers, and alcohol) can increase the risk of respiratory depression, hypotension, profound sedation, or coma. Reduce the initial dose of one or both agents.</li> <li>Avoid concurrent use of mixed opioid agonist/antagonists (i.e., pentazocine, nalbuphine, and butorphanol) or partial opioid agonists (buprenorphine) in patients who have received or are receiving a course of therapy with a full opioid agonist. In these patients, mixed opioid agonist/antagonists and partial opioid agonists may reduce the analgesic effect and/or may precipitate withdrawal symptoms.</li> <li>Opioids may enhance the neuromuscular blocking action of skeletal muscle relaxants and produce an increased degree of respiratory depression.</li> <li>Concurrent use with anticholinergic medication increases the risk of urinary retention and severe constipation, which may lead to paralytic ileus.</li> </ul>	
Use in Opioid-Tolerant Patients	<ul> <li>Patients considered opioid tolerant are those receiving, for one week or longer: <ul> <li>at least 60 mg oral morphine/day</li> <li>25 mcg transdermal fentanyl/hour</li> <li>30 mg oral oxycodone/day</li> <li>8 mg oral hydromorphone/day</li> <li>25 mg oral oxymorphone/day</li> </ul> </li> <li>See individual product information for which products: <ul> <li>Have strengths or total daily doses only for use in opioid-tolerant patients.</li> <li>Are only for use in opioid-tolerant patients at all strengths.</li> </ul> </li> </ul>	
Contraindications	<ul> <li>Significant respiratory depression</li> <li>Acute or severe asthma in an unmonitored setting or in the absence of resuscitative equipment</li> <li>Known or suspected paralytic ileus</li> <li>Hypersensitivity (e.g., anaphylaxis)</li> <li>See individual product information for additional contraindications.</li> </ul>	
Relative Potency To Oral Morphine	<ul> <li>These are intended as general guides.</li> <li>Follow conversion instructions in individual product information.</li> <li>Incomplete cross-tolerance and inter-patient variability require the use of conservative dosing when converting from one opioid to another - halve the calculated comparable dose and titrate the new opioid as needed.</li> </ul>	

Specific Drug Information for Extended-Release and Long-Acting Opioid Analgesics (ER/LA opioid analgesics)	
Avinza	Morphine Sulfate ER Capsules, 30 mg, 45 mg, 60 mg, 75 mg, 90 mg, and 120 mg
Dosing Interval	Once a day
Key Instructions	<ul> <li>Initial dose in opioid non-tolerant patients is 30 mg.</li> <li>Titrate in increments of not greater than 30 mg using a minimum of 3 to day intervals.</li> <li>Swallow capsule whole (do not chew, crush, or dissolve).</li> <li>May open capsule and sprinkle pellets on applesauce for patients who can reliably swallow without chewing; use immediately.</li> <li>Maximum daily dose: 1600 mg due to risk of serious renal toxicity by excipient, fumaric acid.</li> </ul>
Specific Drug Interactions	<ul> <li>Alcoholic beverages or medications containing alcohol may result in the rapid release and absorption of a potentially fatal dose of morphine.</li> <li>P-gp inhibitors (e.g. quinidine) may increase the absorption/exposure o morphine sulfate by about two-fold.</li> </ul>
Use in Opioid-Tolerant Patients	90 mg and 120 mg capsules are for use in opioid-tolerant patients only.
Product-Specific Safety Concerns	None
Butrans	Buprenorphine Transdermal System, 5 mcg/hr, 7.5 mcg/hr, 10 mcg/hr, 15 mcg/hr, 20 mcg/hr
Dosing Interval	One transdermal system every 7 days
Specific Drug Interactions	<ul> <li>5 mcg/hr dose.</li> <li>When converting from 30 mg to 80 mg morphine equivalents - first tape to 30 mg morphine equivalent, then initiate with 10 mcg/hr dose.</li> <li>Titrate in 5 mcg/hour or 10 mcg/hour increments by using no more thar two patches of the 5 mcg/hour or 10-mcg/hour system(s) with a minimu of 72 hours between dose adjustments. The total dose from all patches should not exceed 20mcg/hour</li> <li>Maximum dose: 20 mcg/hr due to risk of QTc prolongation.</li> <li>Application <ul> <li>Apply only to sites indicated in the Full Prescribing Information.</li> <li>Apply to intact/non-irritated skin.</li> <li>Skin may be prepped by clipping hair, washing site with water only</li> <li>Rotate site of application a minimum of 3 weeks before reapplying the same site.</li> <li>Do not cut.</li> </ul> </li> <li>Avoid exposure to heat.</li> <li>Dispose of used/unused patches by folding the adhesive side together and flushing down the toilet.</li> </ul>
Specific Drug Interactions	<ul> <li>CYP3A4 Inhibitors may increase buprenorphine levels.</li> <li>CYP3A4 Inducers may decrease buprenorphine levels.</li> <li>Benzodiazepines may increase respiratory depression.</li> <li>Class IA and III antiarrhythmics, other potentially arrhythmogenic agents, may increase risk for QTc prolongation and torsade de pointe.</li> </ul>
Use in Opioid-Tolerant Patients	Butrans 7.5 mcg/hr, 10 mcg/hr, 15 mcg/hr, and 20 mcg/hr transdermal systems are for use in opioid- tolerant patients only.
Drug-Specific Safety Concerns	<ul> <li>QTc prolongation and torsade de pointe.</li> <li>Hepatotoxicity</li> <li>Application site skin reactions</li> </ul>
Relative Potency To Oral Morphine	Equipotency to oral morphine has not been established.

Specific Drug Information for Extended-Release and Long-Acting Opioid Analgesics (ER/LA opioid analgesics)		
Dolophine	Methadone Hydrochloride	
	Tablets, 5 mg and 10 mg	
Dosing Interval	Every 8 to 12 hours	
Key Instructions	<ul> <li>Initial dose in opioid non-tolerant patients: 2.5 to 10 mg</li> <li>Conversion of opioid-tolerant patients using equianalgesic tables can result in overdose and death. Use low doses according to the table in the full prescribing information.</li> <li>Titrate slowly, with dose increases no more frequent than every 3 to 5 days. Because of high variability in methadone metabolism, some patients may require substantially longer periods between dose increases (up to 12 days).</li> <li>High inter-patient variability in absorption, metabolism, and relative analgesic potency.</li> <li>Opioid detoxification or maintenance treatment shall only be provided in a federally certified opioid (addiction) treatment program (Code of Federal Regulations, Title 42, Sec 8).</li> </ul>	
Specific Drug Interactions	<ul> <li>Pharmacokinetic drug-drug interactions with methadone are complex.</li> <li>CYP 450 inducers may decrease methadone levels.</li> <li>CYP 450 inhibitors may increase methadone levels.</li> <li>Anti-retroviral agents have mixed effects on methadone levels.</li> <li>Potentially arrhythmogenic agents may increase risk for QTc prolongation and torsade de pointe.</li> <li>Benzodiazepines may increase respiratory depression</li> </ul>	
Use in Opioid-Tolerant Patients	Refer to full prescribing information.	
Product-Specific Safety Concerns	<ul> <li>QTc prolongation and torsade de pointe.</li> <li>Peak respiratory depression occurs later and persists longer than analgesic effect.</li> <li>Clearance may increase during pregnancy.</li> <li>False positive urine drug screens possible.</li> </ul>	
Relative Potency To Oral Morphine	Varies depending on patient's prior opioid experience.	
Duragesic	Fentanyl Transdermal System, 12, 25, 37.5*, 50, 62.5*, 75, 87.5*, and 100 mcg/hr (*These strengths are available only in generic form)	
Dosing Interval	Every 72 hours (3 days)	
Key Instructions	<ul> <li>Use product specific information for dose conversion from prior opioid</li> <li>Use 50% of the dose in mild or moderate hepatic or renal impairment, avoid use in severe hepatic or renal impairment</li> <li>Application         <ul> <li>Apply to intact/non-irritated/non-irradiated skin on a flat surface.</li> <li>Skin may be prepped by clipping hair, washing site with water only</li> <li>Rotate site of application.</li> <li>Titrate using a minimum of 72 hour intervals between dose adjustments.</li> <li>Do not cut.</li> </ul> </li> <li>Avoid exposure to heat.</li> <li>Avoid accidental contact when holding or caring for children.</li> <li>Dispose of used/unused patches by folding the adhesive side together and flushing down the toilet.</li> <li>Specific contraindications:         <ul> <li>Patients who are not opioid-tolerant.</li> <li>Management of post-operative pain, including use after out-patient or day surgery.</li> <li>Management of mild pain.</li> </ul> </li> </ul>	

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Specific Drug Info	ormation for Extended-Release and Long-Acting Opioid Analgesics (ER/LA opioid analgesics)
Specific Drug Interactions	<ul> <li>CYP3A4 inhibitors may increase fentanyl exposure.</li> </ul>
	<ul> <li>CYP3A4 inducers may decrease fentanyl exposure.</li> </ul>
	Discontinuation of a concomitantly used cytochrome P450 3A4 inducer
	may result in an increase in fentanyl plasma concentration.
Use in Opioid-Tolerant Patients	All doses of Duragesic are indicated for use in opioid-tolerant patients only.
Product-Specific Safety	<ul> <li>Accidental exposure due to secondary exposure to unwashed/unclothed</li> </ul>
Concerns	application site.
	<ul> <li>Increased drug exposure with increased core body temperature or fever.</li> <li>Bradycardia</li> </ul>
	<ul> <li>Application site skin reactions</li> </ul>
Relative Potency To Oral	See individual product information for conversion recommendations from
Morphine	prior opioid
Embeda	Morphine Sulfate ER-Naltrexone
	Capsules, 20 mg/0.8 mg, 30 mg/1.2 mg, 50 mg/2 mg, 60 mg/2.4 mg,
	80 mg/3.2 mg, 100 mg/4 mg
Dosing Interval	Once a day or every 12 hours
Key Instructions	<ul> <li>Initial dose as first opioid: 20 mg/0.8 mg.</li> </ul>
	<ul> <li>Titrate using a minimum of 1 to 2 day intervals.</li> </ul>
	<ul> <li>Swallow capsules whole (do not chew, crush, or dissolve)</li> </ul>
	Crushing or chewing will release morphine, possibly resulting in fatal
	overdose, and naltrexone, possibly resulting in withdrawal symptoms.
	<ul> <li>May open capsule and sprinkle pellets on applesauce for patients who</li> </ul>
Specific Drug Interactions	<ul> <li>can reliably swallow without chewing, use immediately.</li> <li>Alcoholic beverages or medications containing alcohol may result in the</li> </ul>
Specific Drug Interactions	<ul> <li>Alcoholic beverages of medications containing alcohol may result in the rapid release and absorption of a potentially fatal dose of morphine.</li> </ul>
	<ul> <li>P-gp inhibitors (e.g. quinidine) may increase the absorption/exposure of</li> </ul>
	morphine sulfate by about two-fold.
Use in Opioid-Tolerant Patients	Embeda 100 mg/4 mg capsule is for use in opioid-tolerant patients only.
Product-Specific Safety	None
Concerns	None
Exalgo	Hydromorphone Hydrochloride
Desire a late and	Extended-Release Tablets, 8 mg, 12 mg, 16 mg or 32 mg
Dosing Interval	Once a day
Key Instructions	<ul> <li>Use the conversion ratios in the individual product information.</li> <li>Start patients with moderate hepatic impairment on 25% dose that would</li> </ul>
	<ul> <li>Start patients with moderate nepatic impairment on 25% dose that would be prescribed for a patient with normal hepatic function.</li> </ul>
	<ul> <li>Start patients with moderate renal impairment on 50%, and patients with</li> </ul>
	severe renal impairment on 25% of the dose that would be prescribed for
	a patient with normal renal function.
	<ul> <li>Titrate in increments of 4 to 8 mg using a minimum of 3 to 4 day intervals</li> </ul>
	<ul> <li>Swallow tablets whole (do not chew, crush, or dissolve).</li> </ul>
	Do not use in patients with sulfite allergy—contains sodium metabisulfite.
Specific Drug Interactions	None
Use in Opioid-Tolerant Patients	All doses of Exalgo are indicated for opioid-tolerant patients only.
Drug-Specific Adverse	Allergic manifestations to sulfite component.
Reactions	
	Approximately 5:1 oral morphine to hydromorphone oral dose ratio, use

Hysingla ER	(ER/LA opioid analgesics)	
	Extended-Release Tablets, 20 mg, 30 mg, 40 mg, 60 mg, 80 mg, 100 mg, an 120 mg	
Dosing Interval	Every 24 hours (once-daily)	
Key Instructions	<ul> <li>Opioid-naïve patients: initiate treatment with 20 mg orally once daily. During titration, adjust the dose in increments of 10 mg to 20 mg every 3 to 5 days until adequate analgesia is achieved.</li> <li>Swallow tablets whole (do not chew, crush, or dissolve).</li> <li>Consider use of an alternative analgesic in patients who have difficulty swallowing or have underlying gastrointestinal disorders that may predispose them to obstruction.</li> <li>Take one tablet at a time, with enough water to ensure complete swallowing immediately after placing in the mouth.</li> <li>Use 1/2 of the initial dose and monitor closely for adverse events, such a respiratory depression and sedation, when administering Hysingla ER to patients with severe hepatic impairment or patients with moderate to severe renal impairment.</li> </ul>	
Specific Drug Interactions	<ul> <li>CYP3A4 inhibitors may increase hydrocodone exposure.</li> <li>CYP3A4 inducers may decrease hydrocodone exposure</li> <li>Concomitant use of Hysingla ER with strong laxatives (e.g., Lactulose) that rapidly increase GI motility may decrease hydrocodone absorption and result in decreased hydrocodone plasma levels.</li> <li>The use of MAO inhibitors or tricyclic antidepressants with Hysingla ER may increase the effect of either the antidepressant or Hysingla ER.</li> </ul>	
Use in Opioid-Tolerant Patients	A single dose of Hysingla ER greater than or equal to 80 mg is only for use in opioid tolerant patients.	
Product-Specific Safety Concerns	<ul> <li>Use with caution in patients with difficulty swallowing the tablet or underlying gastrointestinal disorders that may predispose patients to obstruction.</li> <li>Esophageal obstruction, dysphagia, and choking have been reported wit Hysingla ER.</li> <li>In nursing mothers, discontinue nursing or discontinue drug.</li> <li>QTc prolongation has been observed with Hysingla ER following daily doses of 160 mg. Avoid use in patients with congenital long QTc syndrome. This observation should be considered in making clinical decisions regarding patient monitoring when prescribing Hysingla ER in patients with congestive heart failure, bradyarrhythmias electrolyte abnormalities, or who are taking medications that are known to prolong the QTc interval. In patients who develop QTc prolongation, consider reducing the dose.</li> </ul>	
Relative Potency To Oral Morphine	See individual product information for conversion recommendations from prior opioid	
Kadian	Morphine Sulfate Extended-Release Capsules, 10 mg, 20mg, 30 mg, 40 mg, 50 mg, 60 mg, 70 mg, 80 mg, 100 mg, 130 mg, 150 mg, and 200 mg	
Dosing Interval	Once a day or every 12 hours	
Key Instructions	<ul> <li>Product information recommends not using as first opioid.</li> <li>Titrate using a minimum of 2-day intervals.</li> <li>Swallow capsules whole (do not chew, crush, or dissolve).</li> <li>May open capsule and sprinkle pellets on applesauce for patients who ca reliably swallow without chewing, use immediately.</li> </ul>	

Specific Drug Information for Extended-Release and Long-Acting Opioid Analgesics (ER/LA opioid analgesics)		
Specific Drug Interactions	<ul> <li>Alcoholic beverages or medications containing alcohol may result in the rapid release and absorption of a potentially fatal dose of morphine.</li> <li>P-gp inhibitors (e.g. quinidine) may increase the absorption/exposure of morphine sulfate by about two-fold.</li> </ul>	
Use in Opioid-Tolerant Patients	Kadian 100 mg, 130 mg, 150 mg, and 200 mg capsules are for use in opioid tolerant-patients only	
Product-Specific Safety Concerns	None	
MS Contin	Morphine Sulfate Extended-release Tablets, 15 mg, 30 mg, 60 mg, 100 mg, and 200 mg	
Dosing Interval	Every 8 hours or every 12 hours	
Key Instructions	<ul> <li>Product information recommends not using as first opioid.</li> <li>Titrate using a minimum of 1 to 2-day intervals.</li> <li>Swallow tablets whole (do not chew, crush, or dissolve).</li> </ul>	
Specific Drug Interactions	P-gp inhibitors (e.g. quinidine) may increase the absorption/exposure of morphine sulfate by about two-fold.	
Use in Opioid-Tolerant Patients	MS Contin 100 mg and 200 mg tablet strengths are for use in opioid-toleran patients only.	
Product-Specific Safety Concerns	None	
Nucynta ER	Tapentadol Extended-Release Tablets, 50 mg, 100mg, 150 mg, 200 mg, and 250 mg	
Dosing Interval	Every 12 hours	
	<ul> <li>Titrate by 50 mg increments using a minimum of 3-day intervals.</li> <li>Maximum total daily dose is 500 mg</li> <li>Swallow tablets whole (do not chew, crush, or dissolve).</li> <li>Take one tablet at a time and with enough water to ensure complete swallowing immediately after placing in the mouth.</li> <li>Dose once daily in moderate hepatic impairment with 100 mg per day maximum</li> <li>Avoid use in severe hepatic and renal impairment.</li> </ul>	
Specific Drug Interactions	<ul> <li>Alcoholic beverages or medications containing alcohol may result in the rapid release and absorption of a potentially fatal dose of tapentadol.</li> <li>Contraindicated in patients taking MAOIs.</li> </ul>	
Use in Opioid-Tolerant Patients	No product-specific considerations.	
Product-Specific Safety	Risk of serotonin syndrome     Anglesdome	
Concerns Relative Potency To Oral Morphine	Angioedema     Equipotency to oral morphine has not been established.	
Opana ER	Oxymorphone Hydrochloride ER Tablets, 5 mg, 7.5 mg, 10 mg, 15 mg, 20 mg, 30 mg, and 40 mg	
Dosing Interval	Every 12h dosing, some may benefit from asymmetric (different dose given in AM than in PM) dosing.	
Key Instructions	<ul> <li>Use 5 mg every 12 hours as initial dose in opioid non-tolerant patients and patients with mild hepatic impairment and renal impairment (creatinine clearance &lt; 50 mL/min) and patients over 65 years of age</li> <li>Swallow tablets whole (do not chew, crush, or dissolve).</li> <li>Take one tablet at a time, with enough water to ensure complete swallowing immediately after placing in the mouth.</li> </ul>	

Specific Drug Info	rmation for Extended-Release and Long-Acting Opioid Analgesics (ER/LA opioid analgesics)
	<ul> <li>Titrate in increments of 5 to 10 mg using a minimum of 3 to 7-day intervals.</li> </ul>
	<ul> <li>Contraindicated in moderate and severe hepatic impairment.</li> </ul>
Specific Drug Interactions	<ul> <li>Alcoholic beverages or medications containing alcohol may result in the absorption of a potentially fatal dose of oxymorphone.</li> </ul>
Use in Opioid-Tolerant Patients	No product specific considerations.
Product-Specific Safety Concerns	<ul> <li>Use with caution in patients who have difficulty in swallowing or have underlying GI disorders that may predispose them to obstruction, such as a small gastrointestinal lumen.</li> </ul>
Relative Potency To Oral Morphine	Approximately 3:1 oral morphine to oxymorphone oral dose ratio
OxyContin	Oxycodone Hydrochloride Extended-release Tablets, 10 mg, 15 mg, 20 mg, 30 mg, 40 mg, 60 mg, and 80 mg
Dosing Interval	Every 12 hours
Key Instructions	<ul> <li>Initial dose in opioid non-tolerant patients is 10 mg every 12 hours.</li> <li>Titrate using a minimum of 1 to 2 day intervals.</li> <li>Hepatic impairment: start with one third to one half the usual dosage</li> <li>Renal impairment (creatinine clearance &lt;60 mL/min): start with one half the usual dosage.</li> <li>Consider use of other analgesics in patients who have difficulty swalloving or have underlying GI disorders that may predispose them to obstruction. Swallow tablets whole (do not chew, crush, or dissolve).</li> <li>Take one tablet at a time, with enough water to ensure complete swallowing immediately after placing in the mouth.</li> </ul>
Specific Drug Interactions	<ul> <li>CYP3A4 inhibitors may increase oxycodone exposure.</li> <li>CYP3A4 inducers may decrease oxycodone exposure.</li> </ul>
Use in Opioid-Tolerant Patients	<ul> <li>Single dose greater than 40 mg or total daily dose greater than 80 mg are for use in opioid-tolerant patients only.</li> </ul>
Product-Specific Safety Concerns	<ul> <li>Choking, gagging, regurgitation, tablets stuck in the throat, difficulty swallowing the tablet.</li> <li>Contraindicated in patients with gastrointestinal obstruction.</li> </ul>
Relative Potency To Oral Morphine	Approximately 2:1 oral morphine to oxycodone oral dose ratio.
Targiniq ER	Oxycodone Hydrochloride / Naloxone Hydrochloride Extended-release tablets, 10 mg/5 mg, 20 mg/10 mg, and 40 mg/20 mg
Dosing Interval	Every 12 hours
Key Instructions	<ul> <li>Opioid-naïve patients: initiate treatment with 10 mg/5 mg every 12 hours.</li> <li>Titrate using a minimum of 1 to 2 day intervals.</li> <li>Do not exceed 80 mg/40 mg total daily dose (40 mg/20 mg q12) of Targiniq ER</li> <li>May be taken with or without food.</li> <li>Swallow tablets whole. Do not chew, crush, split, or dissolve, as this will release oxycodone, possibly resulting in fatal overdose, and naloxone, possibly resulting in withdrawal symptoms.</li> <li>Hepatic impairment: contraindicated in moderate and severe hepatic impairment. In patients with mild hepatic impairment, start with one thir to one half the usual dosage.</li> <li>Renal impairment (creatinine clearance &lt; 60 mL/min): start with one hal the usual dosage.</li> </ul>
Specific Drug Interactions	CYP3A4 inhibitors may increase oxycodone exposure.     CYP3A4 inducers may decrease oxycodone exposure
Use in Opioid-Tolerant Patients	<ul> <li>Single dose greater than 40 mg/20 mg or total daily dose of 80 mg/40 m are for use in opioid-tolerant patients only</li> </ul>

Contraindicated in patients with moderate to severe hepatic impairment.	
<ul> <li>See individual product information for conversion recommendations from prior opioid.</li> </ul>	
dro ER Hydrocodone Bitartrate Extended-Release Capsules, 10 mg, 15 mg, 20 mg, 30 mg, 40 mg, and 50 mg	
Every 12 hours	
<ul> <li>Initial dose in opioid non-tolerant patient is 10 mg.</li> <li>Titrate in increments of 10 mg using a minimum of 3 to 7day intervals.</li> <li>Swallow capsules whole (do not chew, crush, or dissolve).</li> </ul>	
<ul> <li>Alcoholic beverages or medications containing alcohol may result in the rapid release and absorption of a potentially fatal dose of hydrocodone.</li> <li>CYP3A4 inhibitors may increase hydrocodone exposure.</li> <li>CYP3A4 inducers may decrease hydrocodone exposure.</li> </ul>	
<ul> <li>Single dose greater than 40 mg or total daily dose greater than 80 mg are for use in opioid-tolerant patients only.</li> </ul>	
None	
Approximately 1.5:1 oral morphine to hydrocodone oral dose ratio.	

Prescriber I	Letter #1 This letter ceased distribution on July 31, 2012	
FDA-Required REMS Program for Serious Drug Risks		
Subject:	Announcement of a Risk Evaluation and Mitigation Strategy (REMS) for all extended-release/long- acting opioid analgesic drug products due to their risks of misuse, abuse, addiction, and overdose.	
Dear <b>DEA-</b> Re	egistered Prescriber:	
pain in the U. analgesics ar	ease and long-acting (ER/LA) opioid analgesics are approved for the management of chronic moderate-to-seve S., and can be safe and effective in appropriately selected patients when used as directed. However, opioid e also associated with serious risks and are at the center of a major public health crisis of increased misuse, abu erdose, and death.	
necessary for (addiction, un strategy to m minimize the	and Drug Administration (FDA) has determined that a Risk Evaluation and Mitigation Strategy (REMS) is • ER/LA opioid analgesics to ensure that the benefits continue to outweigh the risks of adverse outcomes nintentional overdose, and death) resulting from inappropriate prescribing, abuse, and misuse. A REMS is a nanage a known or potential serious risk associated with a drug product. In the interest of public health and to • burden on the healthcare delivery system from having multiple unique REMS programs, pharmaceutical ubject to this REMS have joined together to implement this REMS for all ER/LA opioid analgesic drug products.	
The principal	components of this REMS are:	
b) the F	criber training on all ER/LA opioid analgesics, Patient Counseling Document on Extended-Release and Long-Acting Opioid Analgesics (PCD), and ique Medication Guide for each ER/LA opioid analgesic drug product.	
The branded	and generic drug products subject to this REMS include <i>all</i> :	
• fenta	nded-release, oral-dosage forms containing hydromorphone, morphine, oxycodone, oxymorphone, or tapentadol; anyl and buprenorphine-containing transdermal delivery systems; and hadone tablets and solutions that are indicated for use as analgesics.	
Prescriber A	ction	
Under the RE	MS, you are <b>strongly encouraged</b> to do <b>all</b> of the following:	
educ nom <i>comp</i> Pres cour	<b>n (Educate Yourself)</b> - Complete REMS-compliant training offered by an accredited provider of continuing ation (CE) for your discipline. This training is being developed and will be offered early next year at no or inal cost to prescribers. You will be notified when REMS-compliant training will become available. <i>REMS-</i> <i>voluant training</i> will: (a) be delivered by accredited CE providers; (b) cover all elements of the FDA Blueprint for criber Education for Extended-Release and Long-Acting Opioid Analgesics ("FDA Blueprint"); (c) include a post se knowledge assessment; and (d) be subject to independent audit of content and compliance with applicable editing standards.	
patie	nsel Your Patients - Discuss the safe use, serious risks, storage, and disposal of ER/LA opioid analgesics with ents and their caregivers every time you prescribe these medicines. The enclosed <i>Patient Counseling Document</i> <i>inded-Release/Long-Acting Opioid Analgesics</i> (PCD) should be used to facilitate these discussions.	
the i	<b>Chasize Patient and Caregiver Understanding of the Medication Guide -</b> Stress to patients and their caregive mportance of reading the Medication Guide that they will receive from their pharmacist every time an ER/LA id analgesic is dispensed to them, as the information in the Medication Guide may have changed.	

#### Prescriber Letter #1

 Consider Using Other Tools - In addition to the PCD, there are other publicly-available tools to improve patient, household, and community safety when using ER/LA opioid analgesics, as well as compliance with conditions of treatment, including Patient-Prescriber Agreements (PPAs) and risk assessment instruments.

#### **REMS-compliant Training Programs**

A critical component of the ER/LA Opioid Analgesics REMS program is essential safety education for prescribers. REMScompliant training for prescribers, as described previously, will be delivered by accredited CE providers and will include both general and product-specific drug information, as well as information on weighing the benefits and risks of opioid therapy, appropriate patient selection, managing and monitoring patients, and counseling patients on the safe use of these drugs. In addition, the education will include information on how to recognize evidence of, and the potential for, opioid misuse, abuse, addiction, and overdose.

It will be some time before the REMS-compliant training funded by educational grants from the pharmaceutical companies subject to this REMS becomes available. The FDA developed core messages to be communicated to prescribers in the FDA <u>Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics ("FDA Blueprint"</u>), which will be used by accredited CE providers to develop REMS-compliant training courses. A follow-up letter notifying you of the availability of REMS-compliant training funded under this REMS will be sent not later than thirty (30) days before such training is offered. However, REMS-compliant education may also be offered by academic institutions or professional societies independent of REMS-related funding. We encourage you to successfully complete REMS-compliant training offered to improve your ability to prescribe these medications more safely.

#### The Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics (PCD)

Enclosed with this letter is the Patient Counseling Document that was developed under the REMS for ER/LA opioid analgesics to assist you in having important conversations with patients for whom you select an ER/LA opioid analgesic. It contains important safety information common to the drug products subject to this REMS, and includes space for you to write additional information to help your patients use their specific ER/LA opioid analgesic safely. The PCD should be provided to the patient or their caregiver at the time of prescribing. Patients and their caregivers should be counseled on:

- · the importance of taking these medicines exactly as you prescribe them,
- the need to store ER/LA opioid analgesics safely and securely out of the reach of children, pets, and household members – to avoid risks from unintended exposure,
- the importance of not sharing these medications, even if someone has the same symptoms as the patient, and
- the proper methods of disposal of unneeded ER/LA opioid analgesics.

You can re-order or print additional copies of the PCD from www.ER-LA-opioidREMS.com.

#### **Adverse Event Reporting**

To report all suspected adverse reactions associated with the use of the ER/LA opioid analgesics, contact:

- the pharmaceutical company that markets the specific product, or
- the FDA MedWatch program:
  - by phone at 1-800-FDA-1088 (1-800-332-1088) or
  - online at <u>www.fda.gov/medwatch/report.htm</u>

More information about this REMS can be obtained at: <u>www.ER-LA-opioidREMS.com</u> or by calling the ER/LA Opioid Analgesic REMS Call Center at 1-800-503-0784.

Sincerely,

The ER/LA Opioid Analgesic REMS Companies

DDRP Letter 1

Page 2 of 2

Subject:	Availability of Risk Evaluation and Mitigation Strategy (REMS)-compliant training under the REMS for all extended-release/long-acting opioid analgesic drug products.
Dear <b>DEA-</b> R	egistered Prescriber:
pain in the U analgesics a addiction, o Mitigation S	elease and long-acting (ER/LA) opioid analgesics <sup>1</sup> are approved for the management of chronic moderate-to-severe J.S., and can be safe and effective in appropriately selected patients when used as directed. However, opioid re also associated with serious risks and are at the center of a major public health crisis of increased misuse, abuse, verdose, and death. The U.S. Food and Drug Administration (FDA) determined that a Risk Evaluation and trategy (REMS) was necessary to ensure that the benefits of ER/LA opioid analgesics continue to outweigh the erse outcomes (addiction, unintentional overdose, and death) resulting from inappropriate prescribing, abuse, and
	nths ago, you received a letter announcing the REMS for all ER/LA opioid analgesic drug products, which explained ncipal components of this REMS are:
b) the	scriber training on all ER/LA opioid analgesics, <i>Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics</i> (PCD), and nique Medication Guide for each ER/LA opioid analgesic drug product.
REMS-com	pliant Training Programs
analgesics – Opioid Anal be delivered Release and	e of this letter is to provide notification of the upcoming availability of REMS-compliant training on ER/LA opioid provided at a nominal to no cost to prescribers. REMS-compliant training is a critical component of the ER/LA gesics REMS program and constitutes essential safety education for prescribers. <i>REMS-compliant training</i> will: (a) I by accredited CE providers; (b) cover all elements of the FDA Blueprint for Prescriber Education for Extended- Long-Acting Opioid Analgesics ("FDA Blueprint"); (c) include a post-course knowledge assessment; and (d) be idependent audit of content and compliance with applicable accrediting standards.
be commun REMS-comp	oliant training will focus on the safe prescribing of ER/LA opioid analgesics. The FDA developed core messages to icated to prescribers in the FDA Blueprint, which will be used by accredited CE providers to design and deliver oliant training courses. The FDA Blueprint is available at cda.gov/downloads/Drugs/DrugSafety/InformationbyDrugClass/UCM277916.pdf
The core me	essages include:
	derstand how to assess patients and determine which may be appropriate for treatment with ER/LA opioid
<ul><li>Be f</li><li>Be l</li></ul>	lgesics. familiar with how to initiate therapy, modify dose, and discontinue use of ER/LA opioid analgesics. knowledgeable about how to manage and monitor ongoing therapy with ER/LA opioid analgesics. ow how to counsel patients and caregivers about the safe use of ER/LA opioid analgesics, including proper storage
and	l disposal. familiar with general and product-specific drug information concerning ER/LA opioid analgesics.
how to reco	pliant training for prescribers also includes information on weighing the benefits and risks of opioid therapy and gnize evidence of, and the potential for, opioid misuse, abuse, addiction, and overdose. REMS-compliant training offered by academic institutions or learned societies independent of REMS-related funding. We encourage you to
morphine, oxy	ed and generic drug products subject to this REMS include all: a) extended-release, oral-dosage forms containing: hydromorphor codone, oxymorphone, or tapentadol; b) fentanyl and buprenorphine-containing transdermal delivery systems; <u>and</u> c) methadone tablets ar are indicated for use as analgesics.
DDRP Letter 2	Page 1 of 2
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FDA-Required REMS Program for Serious Drug Risks

This letter ceased distribution on January 28, 2013

Prescriber Letter #2

#### Prescriber Letter #2

successfully complete REMS-compliant training from an accredited CE provider to improve your ability to prescribe these medications more safely.

#### Prescriber Action

Under the REMS, you are strongly encouraged to do all of the following:

- Train (Educate Yourself) Complete REMS-compliant training on the ER/LA opioid analgesics offered by an accredited provider of continuing education (CE) for your discipline.
- Counsel Your Patients Discuss the safe use, serious risks, storage, and disposal of ER/LA opioid analgesics with
  patients and their caregivers every time you prescribe these medicines. Use the enclosed Patient Counseling
  Document on Extended-Release/Long-Acting Opioid Analgesics (PCD) to facilitate these discussions.
- Emphasize Patient and Caregiver Understanding of the Medication Guide Stress to patients and their caregivers
  the importance of reading the Medication Guide that they will receive from their pharmacist every time an ER/LA
  opioid analgesic is dispensed to them, as information may have changed.
- Consider Using Other Tools In addition to the PCD, there are other publicly-available tools to improve patient, household, and community safety when using ER/LA opioids, as well as compliance with conditions of treatment, including Patient-Prescriber Agreements (PPAs) and risk assessment instruments.

A listing of REMS-compliant training funded under this REMS appears on www.ER-LA-opioidREMS.com.

#### The Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics (PCD)

Enclosed with this letter is the Patient Counseling Document that was developed under the REMS for ER/LA opioid analgesics to assist you in having important conversations with patients for whom you select an ER/LA opioid analgesic. It contains important safety information common to the drug products subject to this REMS and includes space for you to write additional information to help your patients use their specific ER/LA opioid analgesic safely. The PCD should be provided to the patient or their caregiver at the time of prescribing. Patients and their caregivers should be counseled on:

- the importance of taking these medicines exactly as you prescribe them,
- the need to store ER/LA opioid analgesics safely and securely out of the reach of children, pets, and household members to avoid risks from unintended exposure,
- the importance of not sharing these medications, even if someone has the same symptoms as the patient, and
- the proper methods of disposal of unneeded ER/LA opioid analgesics.

You can re-order or print additional copies of the PCD from www.ER-LA-opioidREMS.com.

#### Adverse Event Reporting

To report all suspected adverse reactions associated with the use of the ER/LA opioid analgesics, contact:

- the pharmaceutical company that markets the specific product, or
  - the FDA MedWatch program:
    - by phone at 1-800-FDA-1088 (1-800-332-1088) or
       online at www.fda.gov/medwatch/report.htm

More information about this REMS can be obtained at: <u>www.ER-LA-opioidREMS.com</u> or by calling the ER/LA Opioid Analgesic REMS Call Center at 1-800-503-0784.

Sincerely,

The ER/LA Opioid Analgesic Companies

DDRP Letter 2

Page 2 of 2

## Prescriber Letter #3

## FDA-Required REMS Program for Serious Drug Risks

Subject: Risk Evaluation and Mitigation Strategy (REMS) for all extended-release/long-acting opioid analgesic drug products due to their risks of misuse, abuse, addiction, and overdose

## Dear DEA-Registered Prescriber:

You are receiving this letter because you recently registered with DEA to prescribe Schedule II or III drugs. The purpose of this letter is to inform you about a Risk Evaluation and Mitigation Strategy (REMS) that has been required by the U.S. Food and Drug Administration (FDA) for all extended-release and long-acting (ER/LA) opioid analgesic drug products.

ER/LA opioid analgesics are used for the management of pain severe enough to require daily, around-the-clock, long-term opioid treatment and for which alternative treatment options are inadequate. Because of the risks of addiction, abuse and misuse with opioids, even at recommended doses, and because of the greater risks of overdose and death with extended-release formulations, reserve ER/LA opioid analgesics for use in patients for whom alternative treatment options (e.g. non-opioid analgesics or immediate-release opioids) are ineffective, not tolerated, or would be otherwise inadequate to provide sufficient management of pain.

They can be safe and effective in appropriately selected patients when used as directed. However, opioid analgesics are also associated with serious risks and are at the center of a major public health crisis of increased misuse, abuse, addiction, overdose, and death.

FDA determined that a REMS was necessary to ensure that the benefits of ER/LA opioid analgesics continue to outweigh their risks of adverse outcomes (addiction, unintentional overdose, and death) resulting from inappropriate prescribing, abuse, and misuse. A REMS is a strategy to manage a known or potential serious risk associated with a drug product. In the interest of public health and to minimize the burden on the healthcare delivery system of having multiple unique REMS programs, the pharmaceutical companies subject to this REMS have joined together to implement the REMS for all ER/LA opioid analgesic drug products.

The ER/LA Opioid Analgesic REMS has three principal components:

- a) prescriber training on all ER/LA opioid analgesics,
- b) a Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics (PCD), and
- c) a unique Medication Guide for each ER/LA opioid analgesic drug product.

The branded and generic drug products subject to this REMS include all:

- extended-release, oral-dosage forms containing
  - hydrocodone,
  - hydromorphone,
  - morphine,
  - oxycodone,
  - oxymorphone, or
  - tapentadol:
- fentanyl and buprenorphine-containing transdermal delivery systems; and
- methadone tablets and solutions that are indicated for use as analgesics.

#### **Prescriber Action**

Under the REMS, you are strongly encouraged to do all of the following:

- Train (Educate Yourself) Complete REMS-compliant training on the ER/LA opioid analgesics offered by an accredited provider of continuing education (CE) for your discipline. *REMS-compliant training* will: (a) be delivered by accredited CE providers; (b) cover all elements of the FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics ("FDA Blueprint"); (c) include a knowledge assessment; and (d) be subject to independent audit of content and compliance with applicable accrediting standards.
- Counsel Your Patients Discuss the safe use, serious risks, storage, and disposal of ER/LA opioid analgesics with
  patients and their caregivers every time you prescribe these medicines. Use the enclosed Patient Counseling
  Document on Extended-Release/Long-Acting Opioid Analgesics (PCD) to facilitate these discussions.

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#### Prescriber Letter #3

- Emphasize Patient and Caregiver Understanding of the Medication Guide Stress to patients and their caregivers the importance of reading the Medication Guide that they will receive from their pharmacist every time an ER/LA opioid analgesic is dispensed to them, as information may have changed.
- Consider Using Other Tools In addition to the PCD, there are other publicly available tools to improve patient, household and community safety when using ER/LA opioid analgesics, as well as compliance with conditions of treatment, including Patient-Prescriber Agreements (PPAs) and risk assessment instruments.

#### **REMS-compliant Training Programs**

REMS-compliant training is a critical component of the ER/LA Opioid Analgesics REMS program. REMS-compliant training will focus on the safe prescribing of ER/LA opioid analgesics. The FDA developed core messages to be communicated to prescribers in the FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics ("FDA Blueprint"), which is being used by accredited CE providers to develop the REMS-compliant training courses. The Blueprint is available at http://www.fda.gov/downloads/Drugs/DrugSafety/InformationbyDrugClass/UCM277916.pdf

REMS-compliant training for prescribers includes both general and product-specific drug information, as well as information on weighing the benefits and risks of opioid therapy, appropriate patient selection, managing and monitoring patients, and counseling patients on the safe use of these drugs. In addition, the education includes information on how to recognize evidence of, and the potential for, opioid misuse, abuse, addiction, and overdose. REMS-compliant training may also be offered by academic institutions or learned societies independent of REMS-related funding. We encourage you to successfully complete REMS-compliant training from an accredited CE provider to improve your ability to prescribe these medications more safely.

For a listing of available REMS-compliant training offered by accredited CE providers under the REMS, visit <u>www.ER-LA-opioidREMS.com</u>.

#### The Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics (PCD)

Enclosed with this letter is the Patient Counseling Document that was developed under the REMS for ER/LA opioid analgesics and designed to assist you in having important conversations with patients for whom you select an ER/LA opioid analgesic. It contains important safety information common to the drug products subject to this REMS, and includes space for you to write additional information to help your patients use their ER/LA opioid analgesic safely. The PCD should be provided to the patient or their caregiver at the time of prescribing. Patients and their caregivers should be counseled on:

- · the importance of taking these medicines exactly as you prescribe them,
- the need to store ER/LA opioid analgesics safely and securely out of the reach of children, pets, and household members- to avoid risks from unintended exposure,
- the importance of not sharing these medications, even if someone has the same symptoms as the patient, and
- the proper methods of disposal of unneeded ER/LA opioid analgesics.

You can re-order or print additional copies of the PCD from www.ER-LA-opioidREMS.com.

## Adverse Event Reporting

To report all suspected adverse reactions associated with the use of the ER/LA opioid analgesics, contact:

- the pharmaceutical company that markets the specific product, or
- the FDA MedWatch program:
  - by phone at 1-800-FDA-1088 (1-800-332-1088) or
  - online at www.fda.gov/medwatch/report.htm

More information about this REMS can be obtained at: <u>www.ER-LA-opioidREMS.com</u> or by calling the ER/LA Opioid Analgesic REMS Call Center at 1-800-503-0784.

Sincerely,

The ER/LA Opioid Analgesic REMS Companies
DDRP Letter 3

Page 2 of 2

Professional Organization/Licensing Board Letter #1

This letter ceased distribution on August 24, 2012

# FDA-Required REMS Program for Serious Drug Risks

Subject: Announcement of a Risk Evaluation and Mitigation Strategy (REMS) for all extended-release/longacting opioid analgesic drug products due to their risks of misuse, abuse, addiction, and overdose

Dear < Professional Organization/Licensing Board>:

We encourage you to share the following information with your <members/licensees>.

Extended-release and long-acting (ER/LA) opioid analgesics are approved for the management of chronic moderate-to-severe pain in the U.S., and can be safe and effective in appropriately selected patients when used as directed. However, opioid analgesics are also associated with serious risks and are at the center of a major public health crisis of increased misuse, abuse, addiction, overdose, and death.

The U.S. Food and Drug Administration (FDA) has determined that a Risk Evaluation and Mitigation Strategy (REMS) is necessary for ER/LA opioid analgesics to ensure that the benefits continue to outweigh the risks of adverse outcomes (addiction, unintentional overdose, and death) resulting from inappropriate prescribing, abuse, and misuse. A REMS is a strategy to manage a known or potential serious risk associated with a drug product. In the interest of public health and to minimize the burden on the healthcare delivery system from having multiple unique REMS programs, pharmaceutical companies subject to this REMS have joined together to implement this REMS for all ER/LA opioid analgesic drug products.

The principal components of this REMS are:

- a) Prescriber training on all ER/LA opioid analgesics,
- b) the Patient Counseling Document on Extended-Release and Long-Acting Opioid Analgesics (PCD), and
- c) a unique Medication Guide for each ER/LA opioid analgesic drug product.

The branded and generic drug products subject to this REMS include all:

- extended-release, oral-dosage forms containing
  - hydromorphone,
  - morphine,
  - oxycodone,
  - oxymorphone, or
  - tapentadol;
- fentanyl and buprenorphine-containing transdermal delivery systems; and
- methadone tablets and solutions that are indicated for use as analgesics.

### Prescriber Action

Under the REMS, prescribers are strongly encouraged to do all of the following:

- Train (Educate Themselves) Complete REMS-compliant training offered by an accredited provider of continuing
  education (CE) for their discipline. This training is being developed and will be offered early next year at no or
  nominal cost to prescribers. You will be notified when REMS-compliant training will become available. *REMScompliant training* will: (a) be delivered by accredited CE providers; (b) cover all elements of the FDA Blueprint for
  Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics ("FDA Blueprint"); (c) include a postcourse knowledge assessment; and (d) be subject to independent audit of content and compliance with applicable
  accrediting standards.
- **Counsel Their Patients** Discuss the safe use, storage, and disposal of ER/LA opioid analgesics with patients and their caregivers every time they prescribe these medicines. The enclosed *Patient Counseling Document (PCD)* on *Extended-Release/Long-Acting Opioid Analgesics* should be used to facilitate these discussions.

DPOLB Letter 1

Page 1 of 2

### Professional Organization/Licensing Board Letter #1

- Emphasize Understanding the Medication Guide Stress to patients and their caregivers the importance of reading the Medication Guide that they will receive from their pharmacist every time an ER/LA opioid analgesic is dispensed to them, as information in the Medication Guide may have changed.
- Consider Using other Tools In addition to the PCD, there are other publicly-available tools to improve patient, household, and community safety when using ER/LA opioid analgesics, as well as compliance with conditions of treatment, including Patient-Prescriber Agreements (PPAs) and risk assessment instruments.

#### **REMS-compliant Training Programs**

A critical component of the ER/LA Opioid Analgesics REMS program is essential safety education for prescribers. REMScompliant training for prescribers, as described previously, will include both general and product-specific drug information, as well as information on weighing the benefits and risks of opioid therapy, appropriate patient selection, managing and monitoring patients, and counseling patients on the safe use of these drugs. In addition, the education will include information on how to recognize evidence of, and the potential for, opioid misuse, abuse, addiction, and overdose.

It will be some time before the REMS-compliant training funded by educational grants from the pharmaceutical companies subject to this REMS becomes available. The FDA developed core messages to be communicated to prescribers in the <u>FDA</u>. <u>Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics ("FDA Blueprint")</u>, which will be used by accredited CE providers to develop REMS-compliant training courses. A follow-up letter notifying you of the availability of REMS-compliant training funded under this REMS will be sent not later than thirty (30) days before such training is offered. However, REMS-compliant education may also be offered by academic institutions or professional societies independent of REMS-related funding. We encourage you to successfully complete REMS-compliant training offered to improve your ability to prescribe these medications more safely.

## The Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics (PCD)

Enclosed with this letter is the Patient Counseling Document that was developed under the REMS for ER/LA opioid analgesics to assist you in having important conversations with patients for whom you select an ER/LA opioid analgesic. It contains important safety information common to the drug products subject to this REMS, and includes space for you to write additional information to help your patients use their specific ER/LA opioid analgesic safely. The PCD should be provided to the patient or their caregiver at the time of prescribing. Patients and their caregivers should be counseled on:

- the importance of taking these medicines exactly as you prescribe them,
- the need to store ER/LA opioid analgesics safely and securely out of the reach of children, pets, and household members – to avoid risks from unintended exposure/ingestion,
- · the importance of not sharing these medications, even if someone has the same symptoms as the patient, and
- the proper methods of disposal of unneeded ER/LA opioid analgesics.

Prescribers can re-order or print additional copies of the PCD from www.ER-LA-opioidREMS.com.

#### **Adverse Event Reporting**

To report all suspected adverse reactions associated with the use of the ER/LA opioid analgesics, contact:

- the pharmaceutical company that markets the specific product, or
- the FDA MedWatch program:
  - by phone at 1-800-FDA-1088 (1-800-332-1088) or
     online at www.fda.gov/medwatch/report.htm

More information about this REMS can be obtained at: <u>www.ER-LA-opioidREMS.com</u> or by calling the ER/LA Opioid Analgesic REMS Call Center at 1-800-503-0784.

Sincerely,

The ER/LA Opioid Analgesic REMS Companies
DPOLB Letter 1

Page 2 of 2

	rganization/Licensing Board Letter #2	This letter ceased distribution on January 2		
FDA-Required REMS Program for Serious Drug Risks				
Subject:	Availability of Risk Evaluation and Mitiga REMS for all extended-release/long-actin	tion (REMS)-compliant training under the g opioid analgesic drug products.		
Dear <b><prof< b="">e</prof<></b>	essional Organization/Licensing Board>:			
moderate-to used as dire major publi Administrat ensure that	p-severe pain in the U.S., and can be safe and eff octed. However, opioid analgesics are also asso c health crisis of increased misuse, abuse, addic tion (FDA) determined that a Risk Evaluation and the benefits of ER/LA opioid analgesics continue	cs <sup>1</sup> are approved for the management of chronic fective in appropriately selected patients when ciated with serious risks and are at the center of a ction, overdose, and death. The U.S. Food and Drug nd Mitigation Strategy (REMS) was necessary to ue to outweigh the risks of adverse outcomes om inappropriate prescribing, abuse, and misuse.		
	nths ago, you received a letter announcing the F ined that the principal components of this REM	REMS for all ER/LA opioid analgesic drug products,		
a) Pre b) the	scriber training on all ER/LA opioid analgesics <i>Patient Counseling Document on Extended-Rele</i> nique Medication Guide for each ER/LA opioid	, ase/Long-Acting Opioid Analgesics (PCD), and		
REMS-com	pliant Training Programs			
on ER/LA op critical com for prescrib elements of Analgesics (	pioid analgesics – provided at a nominal to no o ponent of the ER/LA Opioid Analgesics REMS p ers. <i>REMS-compliant training</i> will: (a) be delive the FDA Blueprint for Prescriber Education for "FDA Blueprint"); (c) include a post-course kno	Extended-Release and Long-Acting Opioid		
independen	t audit of content and compliance with applical			
REMS-comp core messag providers to	bliant training will focus on the safe prescribing	ble accrediting standards. g of ER/LA opioid analgesics. The FDA developed DA Blueprint, which will be used by accredited CE courses. The FDA Blueprint is available at		
REMS-comp core messag providers to http://www.j	pliant training will focus on the safe prescribing ges to be communicated to prescribers in the FI o design and deliver REMS-compliant training c	ble accrediting standards. g of ER/LA opioid analgesics. The FDA developed DA Blueprint, which will be used by accredited CE courses. The FDA Blueprint is available at		
REMS-comp core messag providers to http://www.: The core me e R, Be ana Be Kno incl	oliant training will focus on the safe prescribing ges to be communicated to prescribers in the FI o design and deliver REMS-compliant training of fda.gov/downloads/AboutFDA/ReportsManualsF essages include: derstand how to assess patients and determine /LA opioid analgesics. familiar with how to initiate therapy, modify do ligesics. knowledgeable about how to manage and moni ow how to counsel patients and caregivers about luding proper storage and disposal.	ble accrediting standards. gof ER/LA opioid analgesics. The FDA developed DA Blueprint, which will be used by accredited CE rourses. The FDA Blueprint is available at forms/Forms/UCM163919.pdf which may be appropriate for treatment with ose, and discontinue use of ER/LA opioid itor ongoing therapy with ER/LA opioid analgesics.		
REMS-comp core messag providers to http://www.i The core me e ER, Be ana Be Kno incl Be	oliant training will focus on the safe prescribing ges to be communicated to prescribers in the F1 o design and deliver REMS-compliant training c fda.gov/downloads/AboutFDA/ReportsManualsF essages include: derstand how to assess patients and determine /LA opioid analgesics. familiar with how to initiate therapy, modify do lgesics. knowledgeable about how to manage and moni ow how to counsel patients and caregivers about luding proper storage and disposal. familiar with general and product-specific drug	ble accrediting standards. of ER/LA opioid analgesics. The FDA developed DA Blueprint, which will be used by accredited CE sourses. The FDA Blueprint is available at <u>forms/Forms/UCM163919.pdf</u> which may be appropriate for treatment with ose, and discontinue use of ER/LA opioid itor ongoing therapy with ER/LA opioid analgesics. ut the safe use of ER/LA opioid analgesics. g information concerning ER/LA opioid analgesics.		
REMS-comp core message http://www.j The core me e Und ER, Be ana Be Knu incl Be	oliant training will focus on the safe prescribing ges to be communicated to prescribers in the F1 o design and deliver REMS-compliant training c fda.gov/downloads/AboutFDA/ReportsManualsF essages include: derstand how to assess patients and determine /LA opioid analgesics. familiar with how to initiate therapy, modify do lgesics. knowledgeable about how to manage and moni ow how to counsel patients and caregivers about luding proper storage and disposal. familiar with general and product-specific drug	ble accrediting standards. gof ER/LA opioid analgesics. The FDA developed DA Blueprint, which will be used by accredited CE iourses. The FDA Blueprint is available at forms/Forms/UCM163919.pdf which may be appropriate for treatment with ose, and discontinue use of ER/LA opioid itor ongoing therapy with ER/LA opioid analgesics. ut the safe use of ER/LA opioid analgesics, g information concerning ER/LA opioid analgesics. melude <i>all</i> : a) extended-release, oral-dosage forms containing: tapentadol; b) fentanyl and buprenorphine-containing		

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## Professional Organization/Licensing Board Letter #2

REMS-compliant training for prescribers also includes information on weighing the benefits and risks of opioid therapy and how to recognize evidence of, and the potential for, opioid misuse, abuse, addiction, and overdose. REMS-compliant training may also be offered by academic institutions or learned societies independent of REMS-related funding. We encourage you to successfully complete REMS-compliant training from an accredited CE provider to improve your ability to prescribe these medications more safely.

#### **Requested Action**

We ask you to encourage your <members/licensees> to successfully complete REMS-compliant training to improve their ability to prescribe these medications more safely. Under the REMS, prescribers are **strongly encouraged** to do **all** of the following:

- Train (Educate Themselves) Complete REMS-compliant training offered by an accredited provider of continuing education (CE) for their discipline.
- Counsel Their Patients Discuss the safe use, serious risks, storage, and disposal of ER/LA opioid
  analgesics with patients and their caregivers every time you prescribe these medicines. Use the
  enclosed Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics (PCD) to
  facilitate these discussions. Prescribers can re-order or print additional copies of the PCD from
  www.ER-LA-opioidREMS.com.
- Emphasize Patient and Caregiver Understanding of the Medication Guide Stress to patients and their caregivers the importance of reading the Medication Guide that they will receive from their pharmacist every time an ER/LA opioid analgesic is dispensed to them, as information may have changed.
- Consider Using Other Tools In addition to the PCD, there are other publicly-available tools to
  improve patient, household, and community safety when using ER/LA opioids, as well as compliance
  with conditions of treatment, including Patient-Prescriber Agreements (PPAs) and risk assessment
  instruments.

A listing of REMS-compliant training funded under this REMS appears on <u>www.ER-LA-opioidREMS.com</u>.

## **Adverse Event Reporting**

To report all suspected adverse reactions associated with the use of the ER/LA opioid analgesics, contact:

- the pharmaceutical company that markets the specific product, or
- the FDA MedWatch program:
  - by phone at 1-800-FDA-1088 (1-800-332-1088) or
  - online at <u>www.fda.gov/medwatch/report.htm</u>

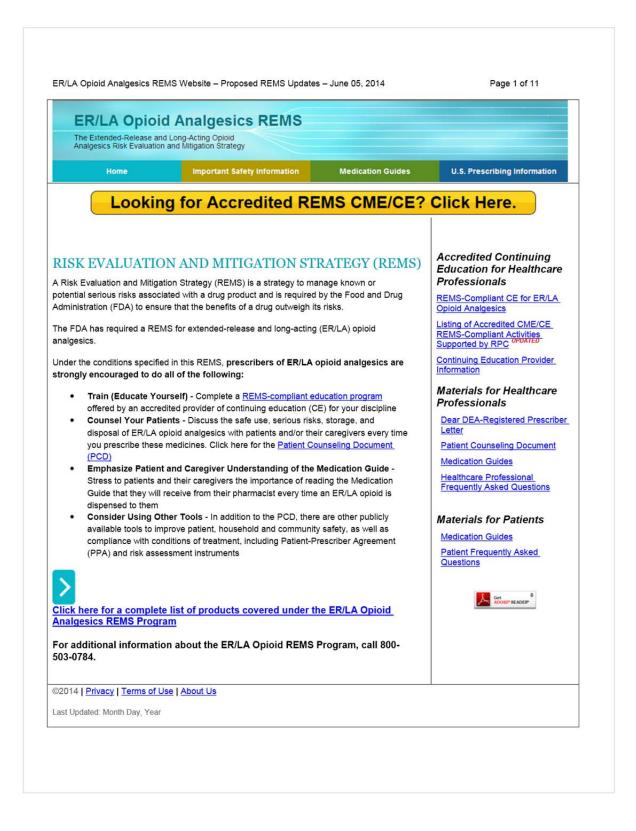
More information about this REMS can be obtained at: <u>www.ER-LA-opioidREMS.com</u> or by calling the ER/LA Opioid Analgesic REMS Call Center at 1-800-503-0784.

Sincerely,

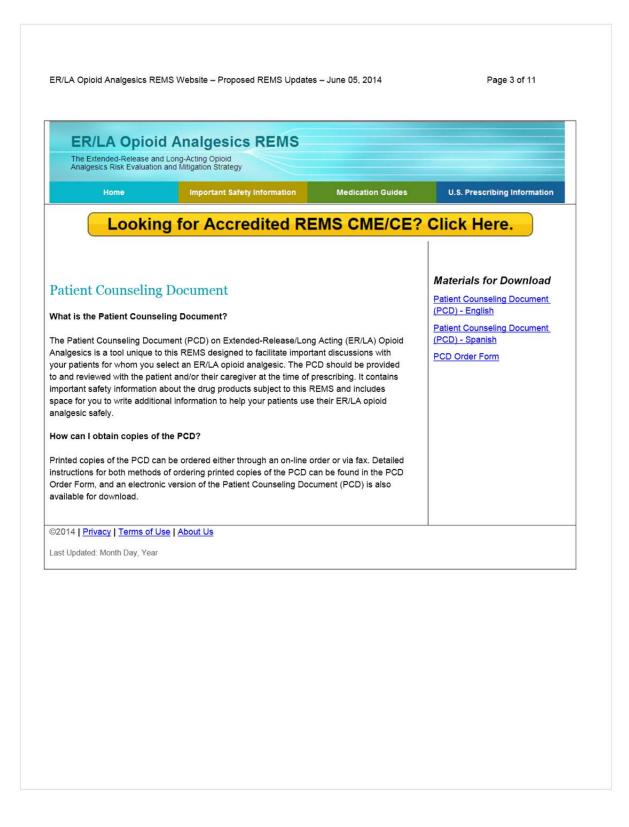
The ER/LA Opioid Analgesic Companies

DPOLB Letter 2

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ER/LA Opioid Analgesics REMS The Extended-Release and Long-Acting Opioid Analgesics Risk Evaluation and Mitigation Strategy					
	Home	Important Safety Information	Medication Guides	U.S. Prescribing Information	
	Looking	for Accredited RE	MS CME/CE?	Click Here.	
Health c nelp ens program REMS-c element Acting C subject t standard The FD/ <u>Blueprin</u> ("FDA B REMS-c	are professionals who p sure the safe and effective is will focus on the safe compliant training will: (a s of the FDA Blueprint for Dpioid Analgesics ("FDA to independent audit of or ds. A has developed core m it for Prescriber Education (ueprint"), which will be compliant training progration ore messages include: Understand how to ass Be familiar with how to opioid analgesics. Be knowledgeable abor analgesics. Know how to counsel p analgesics, including p	E for ER/LA opioid analgesics have rescribe ER/LA opioid analgesics. R prescribing of ER/LA opioid analgesics. ) be delivered by accredited CE provider or Prescriber Education for Extended- Blueprint"); (c) include a knowledge a content and compliance with applicable essages to be communicated to press on for Extended-Release and Long-Ad- used by Continuing Education (CE) p ms. ess patients for treatment with ER/LA initiate therapy, modify dose, and dis ut how to manage ongoing therapy w atients and caregivers about the safe roper storage and disposal. I and product-specific drug informatio	ve a responsibility to EMS-compliant training is. ders; (b) cover all Release and Long- assessment; and (d) be le accrediting cribers in the FDA cting Opioid Analgesics roviders to develop the copioid analgesics. continue use of ER/LA ith ER/LA opioid	Links Listing of Accredited CME/CE REMS-Compliant Activities Supported by RPC FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics ("FDA Blueprint") If you are a CE provider, click here for more information	
•	opioid analgesics.	liant training programs are anticipate	d to be available by		
March 1 <u>Click he</u>	, 2013. re for a listing of availab	le REMS-compliant training activities	and the state of the		
March 1 <u>Click he</u>	, 2013. re for a listing of availab onal grants from the ER/		and the state of the		
March 1 Click he educatio CE prov	, 2013. re for a listing of availab onal grants from the ER/	A opioid analgesics companies and	and the state of the		



The Extended-Release a	id Analgesics REMS		
Analgesics Risk Evaluation	on and Mitigation Strategy Important Safety Information	Medication Guides	U.S. Prescribing Information
Looki	ng for Accredited RE	MS CME/CE?	Click Here.
	v to open a PDF version of that letter.		
Dear DEA-Registe	red Prescriber Letter 3 - Announcing REN	IS approval and REMS-relate	d CME/CE opportunities to newly
DEA-registered Sc	hedule II and III Prescribers		
014   <u>Privacy</u>   <u>Terms of</u>			
014   <u>Privacy</u>   <u>Terms of</u> st Updated: Month Day, Yea			

	Release and Long-Acting Opioid	ics REMS		
Analgesics Risk	Evaluation and Mitigation Strat	egy Safety Information	Medication Guides	U.S. Prescribing Information
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	Joking for Act		MS CME/CE :	Click Here.
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Trade Name	Generic Name	Company	Contact	Links
Comoria N	ame Products			
Generate IV	Generic Name	Company	Contact	Links
ACK TO TOP				
			in the link titled `List of appro	oved application numbers and
ponsors on the Fi	DA Approved REMS website			

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# **Selected Important Safety Information**

# ABUSE POTENTIAL AND RISK OF LIFE-THREATENING RESPIRATORY DEPRESSION

The branded and generic drug products subject to this REMS include all:

- extended-release, oral dosage forms containing
  - hydrocodone,
  - hydromorphone,
  - morphine,
  - oxycodone,
  - oxymorphone, or
  - tapentadol;
- fentanyl and buprenorphine-containing transdermal delivery systems; and
- methadone tablets and solutions that are indicated for use as analgesics.

These drug products will be collectively referred to as Extended-Release and Long-Acting (ER/LA) prescription opioid analgesics.

ER/LA prescription opioid analgesics are opioid agonists and Schedule II or, Schedule III, as is the case with transdermal buprenorphine, controlled substances with abuse liabilities similar to other opioid agonists. Schedule II and Schedule III opioid substances have high potential for abuse and risk of fatal overdose due to respiratory depression.

ER/LA opioid analgesics can be abused in a manner similar to other opioid agonists, legal or illicit. This should be considered when prescribing or dispensing ER/LA opioid analgesics in situations where the physician or pharmacist is concerned about an increased risk of misuse, abuse, or diversion.

Persons at increased risk for opioid abuse include those with a personal or family history of substance abuse (including drug or alcohol abuse or addiction) or mental illness (e.g., major depression). Patients should be assessed for their clinical risks for opioid abuse or addiction prior to being prescribed opioids. All patients receiving opioids should be routinely monitored for signs of misuse, abuse and addiction.

ER/LA opioid analgesics containing buprenorphine, fentanyl, hydrocodone, hydromorphone, methadone, morphine, oxycodone, oxymorphone, and tapentadol are indicated for the management of pain severe enough to require daily, around-the-clock, long-term opioid treatment and for which alternative treatment options are inadequate. **ER/LA opioid analgesics are not indicated for acute pain**.

Because of the risks of addiction, abuse and misuse with opioids, even at recommended doses, and because of the greater risks of overdose and death with extended-release formulations, reserve ER/LA opioid analgesics reserved for use in patients for whom alternative treatment options (e.g. non-opioid analgesics or immediate-release opioids) are ineffective, not tolerated, or would be otherwise be inadequate to provide sufficient management of pain. Additionally, ER hydromorphone and transdermal fentanyl products are only indicated for use in opioid-tolerant patients. For some of the other ER/LA opioid analgesics, certain dosage strengths or certain doses are for use in opioid-tolerant patients only. Consult the individual Full Prescribing Information for dosing instructions for patients who are not opioid tolerant. ER/LA opioid analgesics are not intended for acute pain, pain that is mild or not expected to persist for an extended period of time, or for use on an as-needed basis.

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Patients considered **opioid tolerant** are those who are taking at least 60 mg oral morphine/day, 25 mcg transdermal fentanyl/hour, 30 mg oral oxycodone/day, 8 mg oral hydromorphone/day, 25 mg oral oxymorphone/day, or an equianalgesic dose of another opioid for one week or longer.

ER/LA opioid analgesic formulations have product specific dosage and administration instructions. Refer to the individual Full Prescribing Information for specific doses and dosing recommendations.

ER/LA oral dosage forms must be swallowed whole and must not be cut, broken, chewed, crushed, or dissolved. Taking cut, broken, chewed, crushed or dissolved oral dosage forms leads to rapid release and absorption of a potentially fatal dose of the opioid agonist. For patients who have difficulty swallowing their medication whole, certain oral products may be opened and sprinkled on applesauce—refer to the product-specific Full Prescribing Information.

Transdermal dosage forms must not be cut, damaged, chewed, swallowed or used in ways other than indicated since this may cause choking or overdose resulting in death. Avoid direct external heat sources to transdermal application site and surrounding area.

As stated in the Boxed Warning, prescribers need to be aware of the following:

- ER/LA Opioid Analgesics exposes users to risks of addictions, abuse and misuse, which can lead to overdose and death. Assess each patient's risk before prescribing and monitor regularly for development of these behaviors and conditions.
- Serious life-threatening or fatal respiratory depression may occur. Monitor closely, especially upon initiation or following a dose increase. Instruct patients to swallow ER/LA Opioid Analgesics tablets whole to avoid exposure/ingestion to a potentially fatal dose.
- Accidental ingestion of ER/LA Opioid Analgesics, especially in children, can result in fatal overdose.
- Prolonged use of ER/LA Opioid Analgesics during pregnancy can result in neonatal opioid withdrawal syndrome, which may be life-threatening if not recognized and treated. If opioid use is required for a prolonged period in a pregnant woman, advise the patient of the risk of neonatal opioid withdrawal syndrome and ensure that appropriate treatment will be available.
- Initiation of CYP 3A4 inhibitors (or discontinuation of CYP 3A4 inducers) can result in a fatal overdose.

ER/LA opioid analgesics are contraindicated in patients with a known hypersensitivity to any of the components of ER/LA opioid analgesics, including the respective active ingredients, or in any situation where opioids are contraindicated; in patients who have significant respiratory depression; in patients who have acute or severe bronchial asthma; or in patients who have or are suspected of having paralytic ileus. Additionally, ER hydromorphone and transdermal fentanyl products are contraindicated for use in opioid non-tolerant patients. **These contraindications are not all-inclusive of those for each individual ER/LA opioid analgesic;** therefore, the Full Prescribing Information for the individual ER/LA opioid analgesics must be consulted.

The concomitant use of ER/LA opioid analgesics containing buprenorphine, fentanyl, methadone, or oxycodone with cytochrome P450 3A4 inhibitors may result in increased opioid plasma concentrations and may cause potentially fatal respiratory depression.

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### **Adverse Reactions**

Serious adverse reactions of ER/LA opioid analgesics include life threatening respiratory depression, apnea, respiratory arrest, circulatory depression, hypotension, and death.

Accidental exposure/ingestion of ER/LA opioids, especially in children, can result in death.

With methadone, cases of QT interval prolongation and serious arrhythmia (torsades de pointes) have been observed during treatment. Most cases involve patients being treated for pain with large, multiple daily doses of methadone, although cases have been reported in patients receiving doses commonly used for maintenance treatment of opioid addiction. A positive-controlled study of the effects of transdermal buprenorphine on the QTc interval in healthy subjects demonstrated no clinically meaningful effect at a transdermal buprenorphine dose of 10 mcg/hour; however, a transdermal buprenorphine dose of 40 mcg/hour (given as two 20 mcg/hour transdermal buprenorphine systems) was observed to prolong the QTc interval.

The most common adverse reactions of ER/LA opioid analgesics include constipation, nausea, somnolence, dizziness, vomiting, pruritus, headache, dry mouth, asthenia, and sweating. Additionally, the following have been reported with transdermal buprenorphine and fentanyl products: application site pruritus, application site erythema, and application site rash. Refer to the individual Full Prescribing Information for all product-specific adverse reactions.

# **Adverse Event Reporting**

Please report all suspected adverse reactions associated with the use of the specific ER/LA opioid analgesic to the appropriate company. You may also report adverse events directly to the FDA's MedWatch Reporting System:

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- by calling 1-800-FDA-1088 (1-800-332-1088),
- online at <u>https://www.accessdata.fda.gov/scripts/medwatch/medwatch-online.htm</u> or
- by mail using the fillable portable document format (PDF) Form FDA 3500, available at http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM163919.pdf

## **Patient Counseling Document and Medication Guide**

The Patient Counseling Document (PCD) on Extended-Release/Long-Acting Opioids is a tool unique to this REMS designed to facilitate important discussions with your patients for whom you select an ER/LA opioid analgesic. The PCD should be provided to the patient and/or their caregiver at the time of prescribing. It contains important safety information about the drug products subject to this REMS and includes space for you to write additional information to help your patients use their ER/LA opioid analgesic safely.

Patients and their caregivers should be counseled on: the importance of taking these medicines exactly as you prescribe them, the need to store ER/LA opioid analgesics safely and securely—out of the reach of children, pets, and household acquaintances to avoid risks from unintended exposure, the importance of not sharing these medications, even if someone has the same symptoms as the patient, and the proper methods of disposal of unneeded ER/LA opioid analgesics.

It is important that you encourage your patients to read the relevant Medication Guide when they pick up their prescription from the pharmacy. The Medication Guide provides important information on the safe and effective use of the specific ER/LA opioid analgesic prescribed.

The Exte	ended-Release and	Analgesic Long-Acting Opioid and Mitigation Strategy					
	Home	Important Saf	ety Information	Medication Guid	es	U.S. Prescribin	ng Information
	Looking	g for Accr	edited RE	MS CME/C	E? CI	ick Her	e.
BOUTU	S						
his website	is maintained by	the ER/LA Opioid A	nalgesics REMS P	rogram Companies ("F	PC"), which	is a collaborat	tion of companies
implement	a single shared	REMS. The content	on this website is a	letermined by the RPC was registered to Pur	. This websi	te is hosted on	behalf of, and is
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# Interstitial Popup

The interstitial pop-up is displayed when a website visitor clicks on non-RPC member links on the website pages. The interstitial pop-up is not displayed when a website visitor clicks on the Medication Guides or the U.S. Prescribing Information links on the Products covered under the ER/LA Opioid Analgesics REMS Program page.

Thank you for visiting www.er-la-opioidrems.com.

By clicking "Continue" below, you will be leaving the ER/LA Opioid Analgesics REMS website. RPC is not responsible for the privacy policy, the content or the accuracy of any website accessed through a link.



# Safety Labeling Change Popup

IMPORTANT SAFETY LABEL CHANGES!					
	Revised Indication:				
	· For the management of pain severe enough to require daily, around-the-clock, long-term opioid				
	treatment and for which alternative treatment options are inadequate.				
	Revised Warnings:				
	ADDICTION, ABUSE and MISUSE				
	LIFE-THREATENING RESPIRATORY DEPRESSION				
	ACCIDENTAL INGESTION				
	CYTOCHROME P450 3A4 INTERACTION.				

#### New Warning: • NEONATAL OPIOID WITHDRAWAL SYNDROME

Please click on the U.S. Prescribing Information link for the complete label for each ER/LA opioid drug.

# This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

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DANNY S GONZALEZ 06/25/2015

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REEMA J MEHTA 06/25/2015 I concur. \_\_\_\_\_