

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

22-353

REMS

NDA 022353

COLCRYS™ (colchicine, USP) tablets

Mutual Pharmaceutical Company, Inc.
Philadelphia, PA 19124

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PROPOSED RISK EVALUATION AND MITIGATION STRATEGY (REMS)

I. GOAL(S)

The goal of this REMS is to inform patients of the serious risks associated with the use of COLCRYS™ (colchicine), including the risks of increased susceptibility to colchicine toxicity in patients with renal or hepatic impairment and potential serious drug-drug interactions with colchicine.

II. REMS ELEMENTS

A. Medication Guide

A Medication Guide will be dispensed with each COLCRYS™ (colchicine, USP) tablets prescription in accordance with 21 CFR 208.24.

In accordance with 21 CFR 208.24(b), Mutual will ensure that the Medication Guide is available for distribution to patients by providing the Medication Guide in sufficient numbers to distributors, packers or authorized dispensers to permit the authorized dispenser to provide a Medication Guide to each patient receiving a prescription of COLCRYS™ (colchicine, USP) tablets.

Sufficient numbers of Medication Guides will be included with each COLCRYS™ (colchicine, USP) tablets bottle along with the Prescribing information. Sufficient numbers of Medication Guides will be attached to or provided with each bottle such that one Medication Guide is dispensed with each 30 day supply. Packaging the product literature with the bottles ensures that every patient receives the Medication Guide with each COLCRYS™ (colchicine, USP) tablets prescription.

Mutual will also make the Medication Guide available through use of tear pads or on our website, www.COLCRYS.com.

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In accordance with 21CFR 208.24 (d), Mutual will include a statement on the container labels for COLCRYS™ (colchicine, USP) tablets to alert pharmacists to dispense the Medication Guide with the product.

B. Timetable for Submission of Assessments

	Month/Year of Submission
1st REMS Assessment (18 months from approval date)	April 2011
2nd REMS Assessment (3 years from approval date)	October 2012
3rd REMS Assessment (7 years from approval date)	October 2016

To facilitate inclusion of as much information as possible while allowing reasonable time to prepare the submission, the reporting interval covered by each assessment should conclude no earlier than 60 days before the submission date for that assessment. Mutual will submit each assessment so that it will be received by the FDA on or before the due date.

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REMS Supporting Document

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PROPOSED RISK EVALUATION AND MITIGATION STRATEGY (REMS)
SUPPORTING DOCUMENT

1. BACKGROUND

Due to the potential for serious drug-drug interactions with colchicine and the increased susceptibility to severe colchicine toxicity in patients with renal or hepatic impairment, the FDA recommended on January 7, 2009, via an e-mail from Margarita Tossa, Regulatory Project Manager of Division of Anesthesia, Analgesia and Rheumatology, that Mutual develop and propose a Medication Guide and REMS program for COLCRYS™ (colchicine, USP) tablets.

2. GOAL(S)

The goal of this REMS is to inform patients of the serious risks associated with the use of COLCRYS™ (colchicine), including the risks of increased susceptibility to colchicine toxicity in patients with renal or hepatic impairment and potential serious drug-drug interactions with colchicine.

3. SUPPORTING INFORMATION ON PROPOSED REMS ELEMENTS

A. Additional Potential Elements

- i. Medication Guide:
A Medication Guide will be dispensed with each COLCRYS™ (colchicine, USP) tablets prescription in accordance with 21 CFR 208.24.

In accordance with 21 CFR 208.24(b), Mutual will ensure that the Medication Guide is available for distribution to patients by providing the Medication Guide in sufficient numbers to distributors, packers or authorized dispensers to permit the authorized dispenser to provide a Medication Guide to each patient receiving a prescription of COLCRYS™ (colchicine, USP) tablets.

Sufficient numbers of Medication Guides will be included with each COLCRYS™ bottle along with the Prescribing information. Sufficient numbers of Medication Guides will be attached to or provided with each bottle such that one Medication Guide is dispensed with each 30 day supply. Packaging the product literature with the bottles ensures that every patient receives the Medication Guide with each COLCRYS™ prescription.

Mutual will also make the Medication Guide available through use of tear pads or on our website, www.COLCRYS.com.

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REMS Supporting Document**

In accordance with 21CFR 208.24 (d), Mutual will include a statement on the container labels for COLCRYS™ to alert pharmacists to dispense the Medication Guide with the product.

- ii. Patient Package Insert
Element not necessary
- iii. Communication Plan
This REMS for COLCRYS™ does not include a communication plan.

B. Elements To Assure Safe Use

This REMS for COLCRYS™ does not include elements to assure safe use.

C. Implementation System

Because this REMS for COLCRYS™ does not include elements to assure safe use, an implementation system is not required.

D. Timetable for Assessment of the REMS

The Timetable for Assessments is as follows:

- 1st Assessment: 18 months post approval
- 2nd Assessment: 3 years post approval
- 3rd Assessment: 7 years post approval.

Mutual will submit the assessments within 60 days of the close of the interval as noted above.

4. INFORMATION NEEDED FOR ASSESSMENTS

Mutual will submit for review a detailed plan to evaluate the patients' understanding about the safe use of colchicine at least 2 months before they plan to conduct the evaluation. The submission will include:

1. Sample size and confidence associated with that sample size
2. How the sample will be determined (selection criteria)
3. The expected number of patients to be surveyed.
4. How the participants will be recruited
5. How and how often the surveys will be administered
6. Explain controls used to minimize bias
7. Explain controls used to compensate for the limitations associated with the methodology
8. The survey instruments (questionnaires and/or moderator's guide)
9. Any background information on testing survey questions and correlation to the messages in the Medication Guide

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5. OTHER RELEVANT INFORMATION

Element not necessary