Initial REMS approval: 04/2015

Most recent modification: 11/2015

NDA 21338 IONSYS® (fentanyl iontophoretic transdermal system)

Fentanyl/Opioid

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RISK EVALUATION AND MITIGATION STRATEGY (REMS)

I. GOAL

The goal of the IONSYS REMS is to mitigate the risk of respiratory depression resulting from accidental exposure to persons for whom it is not prescribed by:

- Ensuring dispensing to patients in certified hospitals only; and
- Informing healthcare providers of the serious risk of respiratory depression resulting from accidental exposure.

II. REMS Elements

A. Elements to Assure Safe Use

1. IONSYS is dispensed to patients only in hospitals that are specially certified.

    a. To become specially certified to dispense IONSYS in the IONSYS REMS Program, each certified hospital must:

        i. Designate an Authorized Representative to complete the enrollment process by submitting the completed IONSYS REMS Hospital Enrollment Form on behalf of the certified hospital.

        ii. Ensure the Authorized Representative will oversee implementation and compliance with the IONSYS REMS Program requirements by the following:

            1) Review the IONSYS REMS Safety Brochure: Guide for Nurses and Pharmacists (to which the ***IONSYS Instructions for Use and Disposal*** and the ***IONSYS Guide for Patients*** are attached) and successfully complete the IONSYS REMS Knowledge Assessment.

            2) Ensure that all staff involved in the dispensing and administration of IONSYS are trained on the IONSYS REMS Program requirements as described in the Ionsys REMS Safety Brochure: Guide for Nurses and Pharmacists (to which the IONSYS Instructions for Use and Disposal

and the IONSYS Guide for Patients are attached) and successfully complete the Ionsys Knowledge Assessment, and understand the key risk messages for patients described in the IONSYS Guide for Patients.

3) Ensure that the certified hospital staff involved in the prescribing, dispensing, and administration of IONSYS are informed of risk of respiratory depression and the elements of the IONSYS REMS by distributing the Dear Healthcare Provider Letters and Dear Hospital Pharmacy Letter within 3 weeks of receiving notification from the Medicines Company of certification in the IONSYS REMS Program.

4) Renew enrollment in the IONSYS REMS Program every 3 years from initial enrollment.

5) Put processes and procedures in place to ensure that IONSYS is not dispensed for use outside of a certified hospital.

6) Comply with requests to be audited by The Medicines Company, FDA, or a third party to ensure that all training, processes and procedures for the IONSYS REMS Program are in place and are being followed and appropriate documentation is available upon request.

b. A certified hospital must re-certify in the IONSYS REMS Program within 4 weeks if the hospital designates a new Authorized Representative.

c. The Medicines Company will:

i. Ensure that IONSYS is dispensed only by hospitals that are specially certified.

ii. Ensure that certified hospital enrollment can be completed online, faxed, or mailed to the IONSYS REMS Program.

iii. Ensure that certified hospital are notified when they have been certified by the IONSYS REMS Program. Ensure that the Authorized Representative in certified hospitals are notified following certification in the IONSYS REMS program. This notification must include a certification notification letter, Dear Healthcare Provider Letters and Dear Hospital Pharmacy Letter which the Authorized Representative must distribute to fulfill certification requirements in the IONSYS REMS Program.

iv. Verify every year that the Authorized Representative is the current designated Authorized Representative for the certified hospitals. If different, the hospital will be required to re-certify with a new Authorized Representative.

2. IONSYS will be dispensed to patients only in certain healthcare settings, specifically certified hospitals.

a. The Medicines Company will ensure that IONSYS will be dispensed only in certified hospitals to ensure healthcare providers who prescribe and administer IONSYS are

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informed about the serious risk of respiratory depression resulting from accidental exposure.

3. The following materials are part of the REMS and are appended:

   a. IONSYS REMS Safety Brochure: Guide for Nurses and Pharmacists

   b. IONSYS REMS Knowledge Assessment

   c. IONSYS REMS Dear Healthcare Provider Letters

   d. IONSYS REMS Dear Hospital Pharmacy Letter

   e. IONSYS REMS Hospital Enrollment Form

III. Implementation System

a. The Medicines Company will ensure that IONSYS is only distributed to certified hospitals by:

   i. Ensuring that wholesalers/distributors who distribute IONSYS comply with the program requirements for wholesalers/distributors. In order for a wholesalers/distributor to distribute IONSYS, the wholesalers/distributor must:

      1) Put processes and procedures in place to verify, prior to distributing IONSYS, that the hospitals are certified.
      2) Train all relevant staff on the IONSYS REMS Program requirements.
      3) Agree to be audited by The Medicines Company, FDA, or a third party to ensure that all processes and procedures are in place and are being followed for the IONSYS REMS Program and appropriate documentation is available upon request.
      4) Agree to maintain distribution records and provide distribution data to the The Medicines Company

   ii. Ensuring that wholesalers/distributors maintain distribution records of all shipments of IONSYS and agree to provide the data to the The Medicines Company.

b. The Medicines Company will monitor distribution data and audit the wholesalers/ distributors within 180 days after the wholesaler/distributor initiates participation in the REMS program to ensure that all processes and procedures are in place and functioning to support the requirements of the IONSYS REMS Program. Corrective action will be instituted by The Medicines Company if noncompliance is identified. Corrective action may include de-certifying non-compliant hospitals.

c. The Medicines Company will maintain a validated, secure database of hospitals who are certified to dispense IONSYS in the IONSYS REMS Program.

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d. The Medicines Company will ensure that the certified hospitals REMS requirements are met and may de-certify non-compliant hospitals if the requirements do not continue to be met.

e. The Medicines Company will maintain records of IONSYS distribution to certified hospitals, certified hospitals, and wholesalers/distributors to meet REMS requirements.

f. The Medicines Company will ensure all materials listed in or appended to the IONSYS REMS are available through the IONSYS REMS Program website (www.IONSYSREMS.COM) or through the IONSYS REMS Program Call Center.The REMS program website will include the option to print the Full Prescribing Information and IONSYS REMS materials, including the Knowledge Assessment. The IONSYS product website will include a prominent REMS-specific link to IONSYS REMS Program website (www.IONSYSREMS.com).

g. The Medicines Company will monitor and audit the certified hospitals within 180 days after the hospitals places its first order of IONSYS to ensure that all processes and procedures are in place and functioning to support the requirements of the IONSYS REMS Program. These certified hospitals will also be included in The Medicines Company's ongoing monitoring and annual audit plan. Corrective action will be instituted by The Medicines Company if noncompliance is identified. Corrective action may include de-certifying non-compliant hospitals.

h. The Medicines Company will take reasonable steps to improve implementation of and compliance with the requirements in the IONSYS REMS Program based on monitoring and evaluation of the IONSYS REMS Program.

IV. Timetable for Submission of Assessments

The Medicines Company will submit REMS assessments to the FDA at 6 months and 12 months from the approval date of the initial REMS 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 should conclude no earlier than 60 days before the submission date for that assessment. The Medicines Company will submit each assessment so that it will be received by the FDA on or before the due date.

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