Initial REMS approval: 06/2011
Most recent modification: 03/2016

NDA 020687 MIFEPREX® (mifepristone) Tablets, 200 mg

Antiprogestational Synthetic Steroid

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RISK EVALUATION AND MITIGATION STRATEGY (REMS)

I. GOAL

The goal of the Mifeprex REMS is to mitigate the risk of serious complications associated with Mifeprex by:

a) Requiring healthcare providers who prescribe Mifeprex to be certified in the Mifeprex REMS Program.

b) Ensuring that Mifeprex is only dispensed in certain healthcare settings by or under the supervision of a certified prescriber.

c) Informing patients about the risk of serious complications associated with Mifeprex

II. REMS ELEMENTS

A. Elements to Assure Safe Use

1. Healthcare providers who prescribe Mifeprex must be specially certified.

   a. To become specially certified to prescribe Mifeprex, healthcare providers must:

      i. Review the Prescribing Information for Mifeprex.

      ii. Complete the *Prescriber Agreement Form*. By signing the *Prescriber Agreement Form*, prescribers agree that:

         1) They have the following qualifications:

            a) Ability to assess the duration of pregnancy accurately

b) Ability to diagnose ectopic pregnancies
c) Ability to provide surgical intervention in cases of incomplete abortion or severe bleeding, or to have made plans to provide such care through others, and ability to assure patient access to medical facilities equipped to provide blood transfusions and resuscitation, if necessary.

2) They will follow the guidelines for use of Mifeprex (see b.i-v below).

b. As a condition of certification, healthcare providers must follow the guidelines for use of Mifeprex described below:

i. Review the *Patient Agreement Form* with the patient and fully explain the risks of the Mifeprex treatment regimen. Answer any questions the patient may have prior to receiving Mifeprex.
ii. Sign the *Patient Agreement Form* and obtain the Patient's signature on the *Form*
iii. Provide the patient with a copy of the *Patient Agreement Form* and Medication Guide.
iv. Place the signed *Patient Agreement Form* in the patient's medical record.
v. Record the serial number from each package of Mifeprex in each patient's record.
vi. Report any deaths to Danco Laboratories, identifying the patient by a non-identifiable reference and the serial number from each package of Mifeprex.

c. Danco Laboratories must:

i. Ensure that healthcare providers who prescribe Mifeprex are specially certified in accordance with the requirements described above and de-certify healthcare providers who do not maintain compliance with certification requirements
ii. Provide the Prescribing Information and *Prescriber Agreement Form* to healthcare providers who inquire about how to become certified.

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

- *Prescriber Agreement Form*
- *Patient Agreement Form*

2. Mifeprex must be dispensed to patients only in certain healthcare settings, specifically clinics, medical offices, and hospitals, by or under the supervision of a certified prescriber.

a. Danco Laboratories must:

i. Ensure that Mifeprex is available to be dispensed to patients only in clinics, medical offices and hospitals by or under the supervision of a certified prescriber.

ii. Ensure that Mifeprex is not distributed to or dispensed through retail pharmacies or other settings not described above.

3. Mifeprex must be dispensed to patients with evidence or other documentation of safe use conditions.

a. The patient must sign a *Patient Agreement Form* indicating that she has:

i. Received, read and been provided a copy of the *Patient Agreement Form*.

ii. Received counseling from the prescriber regarding the risk of serious complications associated with Mifeprex.

B. Implementation System

1. Danco Laboratories must ensure that Mifeprex is only distributed to clinics, medical offices and hospitals by or under the supervision of a certified prescriber by:

a. Ensuring that distributors who distribute Mifeprex comply with the program requirements for distributors. The distributors must:

i. Put processes and procedures in place to:

a. Complete the healthcare provider certification process upon receipt of the *Prescriber Agreement Form.*

b. Notify healthcare providers when they have been certified by the Mifeprex REMS Program.

c. Ship Mifeprex only to clinics, medical offices, and hospitals identified by certified prescribers in the signed *Prescriber Agreement Form*.

d. Not ship Mifeprex to prescribers who become de-certified from the Mifeprex Program.

e. Provide the Prescribing Information and *Prescriber Agreement Form* to healthcare providers who (1) attempt to order Mifeprex and are not yet certified, or (2) inquire about how to become certified.

ii. Put processes and procedures in place to maintain a distribution system that is secure, confidential and follows all processes and procedures, including those for storage, handling, shipping, tracking package serial numbers, proof of delivery and controlled returns of Mifeprex.

iii. Train all relevant staff on the Mifeprex REMS Program requirements.

iv. Comply with audits by Danco Laboratories, FDA or a third party acting on behalf of Danco Laboratories or FDA to ensure that all processes and procedures are in place and are being followed for the Mifeprex REMS Program. In addition, distributors must maintain appropriate documentation and make it available for audits.

b. Ensuring that distributors maintain secure and confidential distribution records of all shipments of Mifeprex.

2. Danco Laboratories must monitor distribution data to ensure compliance with the REMS Program.

3. Danco Laboratories must audit new distributors within 90 calendar days after the distributor is authorized to ensure that all processes and procedures are in place and functioning to support the requirements of the Mifeprex REMS Program. Danco Laboratories will take steps to address distributor compliance if noncompliance is identified.

4. Danco Laboratories must take reasonable steps to improve implementation of and compliance with the requirements of the Mifeprex REMS Program based on monitoring and assessment of the Mifeprex REMS Program.

5. Danco Laboratories must report to FDA any death associated with Mifeprex whether or not considered drug-related, as soon as possible but no later than 15 calendar days from the initial receipt of the information by the applicant. This requirement does not affect the applicant's other reporting and follow-up requirements under FDA regulations.

C. Timetable for Submission of Assessments

Danco Laboratories must submit REMS assessments to FDA one year from the date of the initial approval of the REMS (06/08/2011) and every three years 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. Danco Laboratories must submit each assessment so that it will be received by the FDA on or before the due date.