



NDA 020747/S-029

SUPPLEMENT APPROVAL

Cephalon, Inc
41 Moores Road
P.O. Box 4011
Frazer, PA 19355

Attention: Susan Franks, M.S.
Director, Regulatory Affairs

Dear Ms. Franks:

Please refer to your Supplemental New Drug Application (sNDA) dated September 17, 2008, received September 18, 2008, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for ACTIQ (fentanyl citrate) oral transmucosal lozenge.

We acknowledge receipt of your amendments dated April 2, May 1, September 11, and December 4, 2009, and February 22, June 11 and 30, July 28 and 29, August 6, and November 23, 2010, and February 2, and July 1, 7, and 12, 2011.

The April 2, 2009, submission constituted a complete response to our December 5, 2008, action letter.

This "Prior Approval" supplemental new drug application provides for a proposed risk evaluation and mitigation strategy (REMS) for ACTIQ (fentanyl citrate).

We have completed our review of this supplemental application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(1)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>. Content of labeling must be identical to the enclosed labeling (text for the package insert, text for Medication Guide), with the addition of any labeling changes in pending "Changes Being Effected" (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.

Information on submitting SPL files using eLIST may be found in the guidance for industry titled “SPL Standard for Content of Labeling Technical Qs and As” at <http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in MS Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes and annotate each change. To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

We request that the labeling approved today be available on your website within 10 days of receipt of this letter.

CARTON LABELS

We acknowledge your July 7, 2011, submission containing final printed carton labels.

RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS

This “Prior Approval” supplemental new drug application was submitted in accordance with section 909(b)(1) of the Food and Drug Administration Amendments Act of 2007 (FDAAA). Under section 909(b)(1) of FDAAA, we identified ACTIQ (fentanyl citrate) as a product deemed to have in effect an approved REMS because there were in effect on the effective date of FDAAA, March 25, 2008, elements to assure safe use required under 21 CFR 314.520.

In accordance with section 505-1 of the FDCA, we have determined that a REMS is necessary for ACTIQ (fentanyl citrate) to ensure the benefits of the drug outweigh the risk of overdose, abuse, addiction, and serious complications due to medication errors that are listed in the labeling. The details for the REMS requirements and the need for a single, shared system to implement the REMS for all members of the Transmucosal Immediate-Release Fentanyl (TIRF) Products were outlined in our REMS notification letter dated November 12, 2010.

Your proposed REMS, as amended and appended to this letter, is approved. The REMS consists of a Medication Guide, elements to assure safe use, an implementation system, and a timetable for submission of assessments of the REMS.

Pursuant to 505-1(f)(1), we have determined that elements necessary to assure safe use are required as part of the REMS to mitigate the risks described above. The elements to assure safe use will provide for the education of prescribers and patients so that they are aware of the risks associated with the use of ACTIQ and educated about important information regarding how to

use the product safely to help prevent the serious adverse effects noted above. The elements will also support proper patient selection and dispensing of ACTIQ.

We remind you that section 505-1(f)(8) of FDCA prohibits holders of an approved covered application with elements to assure safe use from using any element to block or delay approval of an application under section 505(b)(2) or (j). A violation of this provision in 505-1(f) could result in enforcement action.

The REMS assessment plan should include, but is not limited to, the following:

1. For the assessment of enrollment and discontinuation statistics for prescribers, pharmacies, patients, and wholesalers/distributors, the following data will be tabulated:
 - a. The total numbers and geographic distribution of prescribers enrolled in the ACTIQ REMS program, number of new prescribers enrolled during the current reporting period, and number of prescribers who were inactivated
 - b. The total numbers and geographic distribution of pharmacies enrolled in the ACTIQ REMS program, number of new pharmacies enrolled during the current reporting period, and number of pharmacies that were inactivated (reported by type of pharmacy, inpatient or outpatient)
 - c. The total numbers and geographic distribution of patients enrolled in the ACTIQ REMS program, new patients enrolled during the current reporting period, and number of patients who were inactivated
 - d. The number of completed *Knowledge Assessments* for prescribers and authorized pharmacists, and a tabulation of the number of attempts required to successfully complete the *Knowledge Assessment*
 - e. The total number of wholesalers/distributors enrolled in the ACTIQ REMS program, number of new wholesalers/distributors enrolled during the current reporting period, and number of wholesalers/distributors that were inactivated
 - f. A report on the number of pharmacies that returned product because they did not enroll within six months of REMS program launch
2. Dispensing activity for enrolled pharmacies (outpatient); including authorization to dispense data from enrolled outpatient pharmacies
3. For the assessment of program infrastructure and performance:
 - a. A summary and root cause analysis of all unintended system interruptions (e.g., due to system failure, program failure, inaccurate training), including, but not limited to:
 - 1) Barriers or delays in patient access due to:

- a) False negatives: e.g., all entities are enrolled, but system generated a prescription rejection notice
- b) Prescriber delay in submitting the completed *Patient-Prescriber Agreements* to the ACTIQ REMS Program
- c) Inadvertent enrollment deactivations, or failures to notify enrollees of forthcoming enrollment expirations
- d) Prescriber who is not aware of ACTIQ REMS program (i.e., not enrolled) prescribes ACTIQ
- e) Geographic barriers: lack of enrolled prescribers and/or pharmacies in a patient's local area
- f) A report on the length of the delay (i.e., how long it took for patient to receive ACTIQ after the original prescription was denied by the pharmacy)

2) Inappropriate patient access:

- a) False positives: e.g., one or all entities were not enrolled but system verified dispensing/generated a unique authorization code
 - b) Inpatient pharmacy dispensing for outpatient use
- b. An assessment of the process for pharmacies to upgrade their pharmacy management systems, including a report on the time required for outpatient pharmacies to upgrade their pharmacy management systems (mean, maximum and minimum amount of time), and on the number of pharmacies that tried and were unable to modify their systems
 - c. An evaluation of the enrollment process for prescribers, pharmacists, and wholesalers/distributors, including a summary of the method used to enroll (e.g., online, fax), and a report on the quality of the data received (e.g., number of incomplete forms received)
 - d. Report of reasons for and the number of times a "back-up" system was used to validate a prescription, due to problems at the pharmacy-level, with the Switch or with the ACTIQ REMS database
 - e. Call center report, including a summary of frequently asked questions and problems reported, and any needed program enhancements
 - f. A description of the corrective actions taken based on the programs/system tracking of these occurrences

4. Results of surveys conducted of prescribers' and pharmacists' (inpatient and outpatient) understanding and knowledge of the safe use and appropriate prescribing of ACTIQ, as described in the ACTIQ REMS educational materials and package insert
5. Results of surveys conducted of patients' understanding and knowledge of the serious risks and safe use of ACTIQ.
6. A report on periodic assessments of the distribution and dispensing of the Medication Guide in accordance with 21 CFR 208.24
7. A report on the number of Dear Healthcare Professional letters mailed (prescriber and pharmacy), when the letters were mailed, what information was included in the mailings, and number of returned mailings
8. Results of any prescriber, pharmacy, wholesaler/distributor, and vendor audits conducted, and corrective actions taken during the reporting period
9. A report on failures to adhere to distribution and dispensing requirements, and corrective actions taken to address noncompliance
10. Results of surveillance and monitoring activities for abuse, misuse, and overdose including:
 - a. Signals that indicate misuse, abuse, overdose, or addiction (including patients obtaining prescriptions from multiple prescribers)
 - b. Signals that indicate serious adverse events or deaths related to inappropriate prescribing of ACTIQ, such as prescriptions to non-opioid tolerant patients, and prescriptions for inappropriate doses
11. Drug Utilization Data including the following information:
 - a. The number of cumulative initial and continuing prescriptions to date and new initial prescriptions during the reporting period, as well as minimum, maximum, mean and median number of prescriptions per patient
 - b. ACTIQ Month-to-Date Sales (Distribution) Report (by type of pharmacy, inpatient or outpatient)
 - c. Data from flagged prescriptions from more than two prescribers to the same patient
 - d. An analysis to evaluate ACTIQ REMS utilization patterns including use in non-opioid tolerant patients
12. An assessment of the extent to which the elements to assure safe use are meeting the goal or goals to mitigate a specific serious risk listed in the labeling of the drug, or whether the goal or goals or such elements should be modified.

13. Information on the status of any postapproval study or clinical trial required under section 505(o) or otherwise undertaken to investigate a safety issue. With respect to any such postapproval study, you must include the status of such study, including whether any difficulties completing the study have been encountered. With respect to any such postapproval clinical trial, you must include the status of such clinical trial, including whether enrollment has begun, the number of participants enrolled, the expected completion date, whether any difficulties completing the clinical trial have been encountered, and registration information with respect to requirements under subsections (i) and (j) of section 402 of the Public Health Service Act. You can satisfy these requirements in your REMS assessments by referring to relevant information included in the most recent annual report required under section 506B and 21 CFR 314.81(b)(2)(vii) and including any material or significant updates to the status information since the annual report was prepared. Failure to comply with the REMS assessments provisions in section 505-1(g) could result in enforcement action.

In addition to the assessments submitted according to the timetable included in the approved REMS, you must submit a REMS assessment and may propose a modification to the approved REMS when you submit a supplemental application for a new indication for use as described in section 505-1(g)(2)(A) of FDCA.

If you currently distribute or plan to distribute an authorized generic product under this NDA, you must submit a complete proposed REMS that relates only to the authorized generic product. Submit a proposed REMS, REMS supporting document, and any required appended documents as a prior approval supplement. Approval of the proposed REMS is required before you may market your authorized generic product.

Prominently identify the submission containing the REMS assessments or proposed modifications of the REMS with the following wording in bold capital letters at the top of the first page of the submission as appropriate:

NDA 020747 REMS ASSESSMENT

**NEW SUPPLEMENT FOR NDA 020747
PROPOSED REMS MODIFICATION
REMS ASSESSMENT**

**NEW SUPPLEMENT (NEW INDICATION FOR USE)
FOR NDA 020747
REMS ASSESSMENT
PROPOSED REMS MODIFICATION (if included)**

If you do not submit electronically, please send 5 copies of REMS-related submissions.

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, please contact Kimberly Compton, Senior Regulatory Health Project Manager, at (301) 796-1191.

Sincerely,

{See appended electronic signature page}

Bob A. Rappaport, M.D.
Director
Division of Anesthesia, Analgesia, and
Addiction Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

ENCLOSURE(S):

Content of Labeling
Carton Labeling
REMS

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

/s/

BOB A RAPPAPORT
07/20/2011