



BLA 125390/S-012

**SUPPLEMENT APPROVAL  
REMS ASSESSMENT PLAN REVISION**

Aegerion Pharmaceuticals, Inc.  
Attention: Cathy L. Walker  
Associate Director Regulatory Affairs  
One Main Street, Suite 800  
Cambridge, MA 02142

Dear Ms. Walker:

Please refer to your Supplemental Biologics License Application (sBLA), dated and received June 14, 2017, and your amendments, submitted under section 351(a) of the Public Health Service Act for MYALEPT (metreleptin) for injection.

This Prior Approval sBLA provides for proposed modifications to the approved MYALEPT (metreleptin) risk evaluation and mitigation strategy (REMS).

We have completed our review of this supplemental application, as amended. It is approved effective on the date of this letter.

**RISK EVALUATION AND MITIGATION STRATEGY (REMS) REQUIREMENTS**

The REMS for MYALEPT (metreleptin) was originally approved on February 24, 2014, and the most recent REMS modification was approved on August 27, 2015. The REMS consists of elements to assure safe use, an implementation system, and a timetable for submission of assessments of the REMS. Your proposed modifications to the REMS consists of a) revised prescriber training materials to highlight the risk of developing severe infections and the availability of testing for anti-metreleptin neutralizing antibodies if severe infections occur, and b) addition of a new communication plan which includes a new REMS letter to currently certified prescribers to inform them of the availability of updated training materials.

In accordance with section 505-1 of the Federal Food, Drug, and Cosmetic Act (FDCA), we have determined that the following REMS modifications are necessary to ensure the benefits of the drug outweigh the risks:

**Communication Plan:** We have determined that a communication plan targeted to healthcare providers who are likely to prescribe MYALEPT (metreleptin) will support implementation of the elements of your REMS. The communication plan must provide for the dissemination of

information about the risk of severe infections with the development of metreleptin neutralizing antibodies.

The communication plan must include, at minimum, the following:

- Within 30 days of approval of this supplement, the REMS Letter for Healthcare Providers (Infections) must be mailed to all healthcare providers who prescribed Myalept within the previous 12 months.
- For 12 months after approval of this supplement, the REMS Letter for Healthcare Providers (Infections) must be mailed to all healthcare providers who (1) attempt to prescribe MYALEPT and are not yet certified, or (2) inquire about how to become certified.

Your proposed modified REMS, submitted on June 14, 2017, amended and appended to this letter, is approved. The modified REMS consists of: a communication plan, elements to assure safe use (including healthcare providers are specially certified, pharmacies are specially certified, and the drug is dispensed to patients with evidence or other documentation of safe-use conditions), an implementation system, and a timetable for submission of assessments of the REMS.

The timetable for submission of assessments of the REMS remains the same as that approved on February 24, 2014.

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

1. REMS Program Outreach
  - a. Number of Introductory Information Sheets (MYALEPT REMS Program: An Introduction) provided to prescribers and stratified by method of distribution
  - b. Number of unique visits to the MYALEPT REMS website
  - c. The number of REMS Letters for Healthcare Providers mailed, the date(s) the REMS letters were mailed, and the number of letters returned from as undeliverable
2. REMS Program
  - a. Utilization Statistics / Prescriber Utilization
    - i. Number and specialties of certified prescribers, type of practice setting, and method of enrollment
    - ii. Volume of prescriptions stratified by prescriber and specialty
    - iii. Summary and analysis of neutralizing antibody testing requested by prescribers

If any tests are ordered and subsequently cancelled, provide reasons for cancellation and whether the patient was continued on MYALEPT.
  - b. Pharmacy Utilization
    - i. Number of certified pharmacies
    - ii. Total number of prescriptions dispensed by each certified pharmacy
  - c. Patient Utilization
    - i. Number of patients who have received at least one prescription for MYALEPT
    - ii. Number of patients with a completed Prescription Authorization Form who have not received a dispensed prescription for MYALEPT

- iii. Time between receipt of Prescription Authorization Form and prescription dispensing (mean, median, range) and an analysis summarizing any reasons for delays that are related to the MYALEPT REMS Program requirements.
  - iv. For i and ii, provide demographics of patients including age and gender
  - v. Duration of MYALEPT therapy for patients (mean, median, range)
  - vi. Number of patients who discontinued treatment and duration of treatment (mean, median, range)
3. Program Infrastructure and Performance
  - a. Summary of call center Frequently Asked Questions
  - b. Summary of program problems reported
  - c. Number of prescriptions written by non-certified prescribers
  - d. Number of prescriptions dispensed by non-certified pharmacies
  - e. Number of prescriptions dispensed to patients without a completed Prescription Authorization form
  - f. Number of prescribers inactivated for noncompliance with the MYALEPT REMS Program requirements. Include summary of reasons for inactivation.
  - g. Number of pharmacies inactivated for noncompliance with the MYALEPT REMS Program requirements. Include summary of reasons for inactivation.
  - h. A summary report of serious or critical deviations found, and corrective actions taken for any certified pharmacy audits conducted during the reporting period
4. Assessment of Prescribers and Pharmacists understanding of the following:  
Aegerion will conduct healthcare provider surveys at 4 years after initial approval of the REMS then every two years thereafter. The surveys will evaluate understanding of the following:
  - a. The risks of metreleptin
    - i. Serious adverse events resulting from the development anti-drug antibodies with neutralizing activity
    - ii. Lymphoma
  - b. The appropriate use of metreleptin
  - c. The metreleptin REMS program requirements
5. The requirements for assessments of an approved REMS under section 505-1(g)(3) include with respect to each goal included in the strategy, an assessment of the extent to which the approved strategy, including each element of the strategy, is meeting the goal or whether one or more such goals or such elements should be modified.

We remind you that in addition to the REMS assessments submitted according to the timetable in the approved REMS, you must include an adequate rationale to support a proposed REMS modification for the addition, modification, or removal of any goal or element of the REMS, as described in section 505-1(g)(4) of the FDCA.

We also remind you that you must submit a REMS assessment when you submit a supplemental application for a new indication for use, as described in section 505-1(g)(2)(A) of the FDCA. This assessment should include:

- a) An evaluation of how the benefit-risk profile will or will not change with the new indication;
- b) A determination of the implications of a change in the benefit-risk profile for the current REMS;
- c) *If the new indication for use introduces unexpected risks*: A description of those risks and an evaluation of whether those risks can be appropriately managed with the currently approved REMS.
- d) *If a REMS assessment was submitted in the 18 months prior to submission of the supplemental application for a new indication for use*: A statement about whether the REMS was meeting its goals at the time of the last assessment and if any modifications of the REMS have been proposed since that assessment.
- e) *If a REMS assessment has not been submitted in the 18 months prior to submission of the supplemental application for a new indication for use*: Provision of as many of the currently listed assessment plan items as is feasible.
- f) *If you propose a REMS modification based on a change in the benefit-risk profile or because of the new indication of use, submit an adequate rationale to support the modification, including*: Provision of the reason(s) why the proposed REMS modification is necessary, the potential effect on the serious risk(s) for which the REMS was required, on patient access to the drug, and/or on the burden on the health care delivery system; and other appropriate evidence or data to support the proposed change. Additionally, include any changes to the assessment plan necessary to assess the proposed modified REMS. *If you are not proposing REMS modifications*, provide a rationale for why the REMS does not need to be modified.

If the assessment instruments and methodology for your REMS assessments are not included in the REMS supporting document, or if you propose changes to the submitted assessment instruments or methodology, you should update the REMS supporting document to include specific assessment instrument and methodology information at least 90 days before the assessments will be conducted. Updates to the REMS supporting document may be included in a new document that references previous REMS supporting document submission(s) for unchanged portions. Alternatively, updates may be made by modifying the complete previous REMS supporting document, with all changes marked and highlighted. Prominently identify the submission containing the assessment instruments and methodology with the following wording in bold capital letters at the top of the first page of the submission:

**BLA 125390 REMS ASSESSMENT METHODOLOGY**

Prominently identify any 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:

**BLA 125390 REMS ASSESSMENT**

*or*

**NEW SUPPLEMENT FOR BLA 125390  
CHANGES BEING EFFECTED IN 30 DAYS  
PROPOSED MINOR REMS MODIFICATION**

*or*

**NEW SUPPLEMENT FOR BLA 125390  
PRIOR APPROVAL SUPPLEMENT  
PROPOSED MAJOR REMS MODIFICATION**

*or*

**NEW SUPPLEMENT FOR BLA 125390  
PRIOR APPROVAL SUPPLEMENT  
PROPOSED REMS MODIFICATIONS DUE TO SAFETY LABEL CHANGES  
SUBMITTED IN SUPPLEMENT XXX**

*or*

**NEW SUPPLEMENT (NEW INDICATION FOR USE)  
BLA 125390  
REMS ASSESSMENT  
PROPOSED REMS MODIFICATION (if included)**

Should you choose to submit a REMS revision, prominently identify the submission containing the REMS revisions with the following wording in bold capital letters at the top of the first page of the submission:

**REMS REVISIONS FOR BLA 125390**

To facilitate review of your submission, we request that you submit your proposed modified REMS and other REMS-related materials in Microsoft Word format. If certain documents, such as enrollment forms, or website screenshots are only in PDF format, they may be submitted as such, but Word format is preferred.

**SUBMISSION OF REMS DOCUMENT IN SPL FORMAT**

FDA can accept the REMS document in Structured Product Labeling (SPL) format. If you intend to submit the REMS document in SPL format, as soon as possible, but no later than 14 days from the date of this letter, submit the REMS document in SPL format using the FDA automated drug registration and listing system (eLIST).

For more information on submitting REMS in SPL format, please email [REMS\\_Website@fda.hhs.gov](mailto:REMS_Website@fda.hhs.gov).

## **REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

If you have any questions, call Martin White, M.S., Regulatory Project Manager, at (240) 402-6018.

Sincerely,

*{See appended electronic signature page}*

James P. Smith, M.D., M.S.  
Deputy Director  
Division of Metabolism and Endocrinology Products  
Office of Drug Evaluation II  
Center for Drug Evaluation and Research

### ENCLOSURES:

MYALEPT REMS Document

MYALEPT REMS Materials:

- Prescriber Training Module
- Prescriber Enrollment Form
- MYALEPT REMS Program: An Introduction
- MYALEPT REMS Program Website
- MYALEPT REMS Prescription Authorization Form
- REMS Letter for Healthcare Providers (Infections)

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**This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.**  
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/s/  
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JAMES P SMITH  
12/11/2017