

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:
ANDA 075945/S-014

Name: Amnesteem (Isotretinoin Capsules USP)
10 mg, 20 mg, 40 mg

Sponsor: Genpharm, Inc.

Approval Date: March 25, 2010

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APPLICATION NUMBER:
ANDA 075945/S-014

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APPLICATION NUMBER:
ANDA 075945/S-014

APPROVAL LETTER



ANDA 75-945/S-014

Mylan Pharmaceuticals Inc.
Attention: Wayne Talton
781 Chestnut Ridge Road
P.O. Box 4310
Morgantown, WV 26504-4310

Dear Sir:

This is in reference to your supplemental new drug application dated March 4, 2010, submitted pursuant to 21 CFR 314.70(c)(6) [Supplement - Changes Being Effected] regarding your abbreviated new drug application for Amnesteem[®] (Isotretinoin Capsules USP), 10 mg, 20 mg, and 40 mg.

This supplemental application provides for revised insert and medication guide labeling to be in accordance with the most recently approved labeling for the reference listed drug, Accutane[®] Capsules (NDA 18-662/S-060: Approved February 01, 2010).

We have completed the review of this supplemental application and it is approved.

We remind you that you must comply with the requirements for an approved abbreviated new drug application described in 21 CFR 314.80-81.

The material submitted is being retained in our files.

Regards,

{See appended electronic signature page}

Wm. Peter Rickman
Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

Application Type/Number	Submission Type/Number	Submitter Name	Product Name
----- ANDA-75945	----- SUPPL-14	----- GENPHARM INC	----- ISOTRETINOIN

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

/s/

JOHN F GRACE
03/25/2010
for Wm Peter Rickman

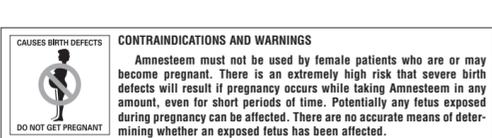
CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 075945/S-014

LABELING



AMNESTEEM® (Isotretinoin Capsules USP)



CONTRAINDICATIONS AND WARNINGS

Amnesteem must not be used by female patients who are or may become pregnant. There is an extremely high risk that severe birth defects will result if pregnancy occurs while taking Amnesteem in any amount, even for short periods of time. Potentially any fetus exposed during pregnancy can be affected. There are no accurate means of determining whether an exposed fetus has been affected.

Birth defects which have been documented following Amnesteem exposure include abnormalities of the face, eyes, ears, skull, central nervous system, cardiovascular system, and thymus and parathyroid glands. Cases of IQ scores less than 85 with or without other abnormalities have been reported. There is an increased risk of spontaneous abortion and premature births have been reported.

Documented external abnormalities include: skull anomalies; ear abnormalities (including anotia, microtymia, small or absent external auditory canals); eye abnormalities (including microphthalmia); facial dysmorphism; cleft palate. Documented internal abnormalities include: CNS abnormalities (including cerebellar abnormalities, cerebellar malformation, hydrocephalus, microcephaly, cranial nerve deficit); cardiovascular abnormalities; thymus gland abnormality; parathyroid hormone deficiency. In some cases death has occurred with certain of the abnormalities previously noted.

If pregnancy does occur during treatment of a female patient who is taking Amnesteem, Amnesteem must be discontinued immediately and she should be referred to an Obstetrician-Gynecologist experienced in reproductive toxicity for further evaluation and counseling.

Special Prescribing Requirements

Because of Amnesteem's teratogenicity and to minimize fetal exposure, Amnesteem is approved for marketing only under a special restricted distribution program approved by the Food and Drug Administration. This program is called iPLEDGE™. Amnesteem must only be prescribed by prescribers who are registered and activated with the iPLEDGE program. Amnesteem must only be dispensed by a pharmacy registered and activated with iPLEDGE, and must only be dispensed to patients who are registered and meet all the requirements of iPLEDGE (see PRECAUTIONS).

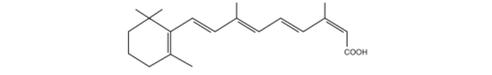
Table 1. Monthly Required iPLEDGE Interactions

	Female Patients of Childbearing Potential	Male Patients, and Female Patients not of Childbearing Potential
PRESCRIBER		
Confirms patient counseling	X	X
Enters the two contraception methods chosen by the patient	X	
Enters pregnancy test results	X	
PATIENT		
Answers educational questions before every prescription	X	
Enters two forms of contraception	X	
PHARMACIST		
Contacts system to get an authorization	X	X

DESCRIPTION: Isotretinoin, USP, a retinoid, is available as Amnesteem (isotretinoin capsules, USP) in 10 mg, 20 mg and 40 mg soft gelatin capsules for oral administration. Each capsule contains yellow wax, butylated hydroxyanisole, edetate disodium, hydrogenated vegetable oil and soybean oil. Gelatin capsules contain glycerin, with the following dye systems: 10 mg – red iron oxide paste and black ink; 20 mg – red iron oxide paste, yellow iron oxide paste, titanium dioxide and black ink; 40 mg – red iron oxide paste, yellow iron oxide paste, titanium dioxide and black ink.

USP Dissolution Test Pending.

Chemically, isotretinoin is 13-*cis*-retinoic acid and is related to both retinoic acid and retinol (vitamin A). It is a yellow to orange crystalline powder with a molecular weight of 300.44. The structural formula is:



CLINICAL PHARMACOLOGY: Isotretinoin is a retinoid, which when administered in pharmacologic dosages of 0.5 to 1 mg/kg/day (see DOSAGE AND ADMINISTRATION), inhibits sebaceous gland function and keratinization. The exact mechanism of action of isotretinoin is unknown.

Nodular Acne: Clinical improvement in nodular acne patients occurs in association with a reduction in sebume secretion. The decrease in sebume secretion is temporary and is related to the dose and duration of treatment with Amnesteem, and reflects a reduction in sebaceous gland size and an inhibition of sebaceous gland differentiation.¹

Pharmacokinetics: Absorption: Due to its high lipophilicity, oral absorption of isotretinoin is enhanced when given with a high fat meal. In a crossover study, 74 healthy adult subjects received a single 80 mg oral dose (2 x 40 mg capsules) of Amnesteem under fasted and fed conditions. Both peak plasma concentration (C_{max}) and the total exposure (AUC) of isotretinoin were more than doubled following a standardized high fat meal when compared with Amnesteem given under fasted conditions (see Table 2). The observed elimination half-life was unchanged. This lack of change in half-life suggests that food increases the bioavailability of isotretinoin without altering its disposition. The time to peak concentration (T_{max}) was also increased with food and may be related to a longer absorption phase. Therefore, Amnesteem capsules should always be taken with food (see DOSAGE AND ADMINISTRATION). Clinical studies have shown that there is no difference in the pharmacokinetics of isotretinoin between patients with nodular acne and healthy subjects with normal skin.

Amnesteem 2 x 40 mg Capsules	AUC ₀₋₂₄ (ng-hr/mL)	C _{max} (ng/mL)	T _{max} (hr)	t _{1/2} (hr)
Fed ^a	10,004 (22%)	862 (22%)	5.3 (77%)	21 (39%)
Fasted	3,703 (46%)	301 (63%)	3.2 (56%)	21 (30%)

^aEating a standardized high fat meal

Distribution: Isotretinoin is more than 99.9% bound to plasma proteins, primarily albumin.

Metabolism: Following oral administration of isotretinoin, at least three metabolites have been identified in human plasma: 4-*oxo*-isotretinoin, retinoic acid (tretinoin), and 4-*oxo*-retinoic acid (4-*oxo*-tretinoin). Retinoic acid and 13-*cis*-retinoic acid are geometric isomers and show reversible interconversion. The administration of one isomer will give rise to the other. Isotretinoin is also irreversibly oxidized to 4-*oxo*-isotretinoin, which forms its geometric isomer 4-*oxo*-tretinoin.

After a single 80 mg oral dose of Amnesteem to 74 healthy adult subjects, concurrent administration of food increased the extent of formation of all metabolites in plasma when compared to the extent of formation under fasted conditions.

All of these metabolites possess retinoid activity that is in some *in vitro* models more than that of the parent isotretinoin. However, the clinical significance of these models is unknown. After multiple oral dose administration of isotretinoin to adult cystic acne patients (≥ 18 years), the exposure of patients to 4-*oxo*-isotretinoin at steady-state under fasted and fed conditions was approximately 3.4 times higher than that of isotretinoin.

In vitro studies indicate that the primary P450 isoforms involved in isotretinoin metabolism are 2C8, 2C9, 3A4 and 2B6. Isotretinoin and its metabolites are further metabolized into conjugates, which are then excreted in urine and feces.

Elimination: Following oral administration of an 80 mg dose of ¹⁴C-isotretinoin as a liquid suspension, ¹⁴C-activity in blood declined with a half-life of 90 hours. The metabolites of isotretinoin and

any conjugates are ultimately excreted in the feces and urine in relatively equal amounts (total of 65% to 83%). After a single 80 mg oral dose of Amnesteem to 74 healthy adult subjects under fed conditions, the mean ± SD elimination half-lives (t_{1/2}) of isotretinoin and 4-*oxo*-isotretinoin were 21 ± 8.2 hours and 24 ± 5.3 hours, respectively. After both single and multiple doses, the observed accumulation ratios of isotretinoin ranged from 0.9 to 5.43 in patients with cystic acne.

Special Patient Populations: Pediatric Patients: The pharmacokinetics of isotretinoin were evaluated after single and multiple doses in 39 pediatric patients (12 to 15 years) and 19 adult patients (≥ 18 years) who received Amnesteem for the treatment of severe recalcitrant nodular acne. In both age groups, 4-*oxo*-isotretinoin was the major metabolite; tretinoin and 4-*oxo*-tretinoin were also observed. The dose-normalized pharmacokinetic parameters for isotretinoin following single and multiple doses are summarized in Table 3 for pediatric patients. There were no statistically significant differences in the pharmacokinetics of isotretinoin between pediatric and adult patients.

 Table 3. Pharmacokinetic Parameters of Isotretinoin Following Single and Multiple Dose Administration in Pediatric Patients, 12 to 15 Years of Age Mean (± SD), N = 38^a

Parameter	Isotretinoin (Single Dose)	Isotretinoin (Steady-State)
C _{max} (ng/mL)	573.25 (278.79)	731.98 (361.86)
AUC _{0 to 12} (ng-hr/mL)	3033.37 (1394.17)	5082 (2184.23)
AUC _{0 to 24} (ng-hr/mL)	6003.81 (2885.67)	—
T _{max} (hr) ^b	4 (0 to 12)	4 (0 to 12)
CS _{5min} (ng/mL)	—	352.32 (184.44)
T _{1/2} (hr)	—	15.69 (5.12)
CL/F (L/hr)	—	17.96 (6.27)

^aThe single and multiple dose data in this table were obtained following a non-standardized meal that is not comparable to the high-fat meal that was used in the study in Table 2.

^bMedian (range)

In pediatric patients (12 to 15 years), the mean ± SD elimination half-lives (t_{1/2}) of isotretinoin and 4-*oxo*-isotretinoin were 15.7 ± 5.1 hours and 23.1 ± 5.7 hours, respectively. The accumulation ratios of isotretinoin ranged from 0.46 to 3.65 for pediatric patients.

INDICATIONS AND USAGE: Severe Recalcitrant Nodular Acne: Amnesteem is indicated for the treatment of severe recalcitrant nodular acne. Nodules are inflammatory lesions with a diameter of 5 mm or greater. The nodules may become suppurative or hemorrhagic. "Severe," by definition,² means "many" as opposed to "few or several" nodules. *Because of significant adverse effects associated with its use, Amnesteem should be reserved for patients with severe nodular acne who are unresponsive to conventional therapy, including systemic antibiotics.* In addition, Amnesteem is indicated only for those female patients who are not pregnant, because Amnesteem can cause severe birth defects (see Boxed CONTRAINDICATIONS AND WARNINGS).

A single course of therapy for 15 to 20 weeks has been shown to result in complete and prolonged remission of disease in many patients.^{1,3-11} If a second course of therapy is needed, it should not be initiated until at least 6 weeks after completion of the first course, because experience has shown that patients may continue to improve while off Amnesteem. The optimal interval before retreatment has not been defined for patients who have not completed skeletal growth (see WARNINGS: Skeletal: Bone Mineral Density, Hyperostosis, and Premature Epiphyseal Closure).

CONTRAINDICATIONS: Pregnancy: Category X. See Boxed CONTRAINDICATIONS AND WARNINGS.

Allergic Reactions: Amnesteem is contraindicated in patients who are hypersensitive to this medication or to any of its components (see PRECAUTIONS: Hypersensitivity).

WARNINGS: Psychiatric Disorders: Amnesteem may cause depression, psychosis and, rarely, suicidal ideation, suicide attempts, suicide, and aggressive and/or violent behaviors. No mechanism of action has been established for these events (see ADVERSE REACTIONS: Psychiatric). Prescribers should read the brochure, *Recognizing Psychiatric Disorders in Adolescents and Young Adults: A Guide for Prescribers of Isotretinoin*. Prescribers should be alert to the warning signs of psychiatric disorders to guide patients to receive the help they need. Therefore, prior to initiation of Amnesteem therapy, patients and family members should be asked about any history of psychiatric disorder, and at each visit during therapy patients should be assessed for symptoms of depression, mood disturbance, psychosis, or aggression to determine if further evaluation may be necessary. Signs and symptoms of depression, as described in the brochure ("Recognizing Psychiatric Disorders in Adolescents and Young Adults"), include sad mood, hopelessness, feelings of guilt, worthlessness or helplessness, loss of pleasure or interest in activities, fatigue, difficulty concentrating, change in sleep pattern, change in weight or appetite, suicidal thoughts or attempts, restlessness, inability to act, acting on dangerous impulses, and persistent physical symptoms. Patients who are on treatment. Patients should stop Amnesteem and the patient or a family member should promptly contact their prescriber if the patient develops depression, mood disturbance, psychosis, or aggression, without waiting until the next visit. Discontinuation of Amnesteem therapy may be insufficient; further evaluation may be necessary. While such monitoring may be helpful, it may not detect all patients at risk. Patients may report mental health problems or family history of psychiatric disorders. These reports should be discussed with the patient and/or the patient's family. A referral to a mental health professional may be necessary. The physician should consider whether Amnesteem therapy is appropriate in this setting; for some patients the risks may outweigh the benefits of Amnesteem therapy.

Pseudotumor Cerebri: Amnesteem use has been associated with a number of cases of pseudotumor cerebri (benign intracranial hypertension), some of which involved concomitant use of tetracyclines. Concomitant treatment with tetracyclines should therefore be avoided. Early signs and symptoms of pseudotumor cerebri include papilledema, headache, nausea and vomiting, and visual disturbances. Patients with these symptoms should be screened for papilledema and, if present, they should be told to discontinue Amnesteem immediately and be referred to a neurologist for further diagnosis and care (see ADVERSE REACTIONS: Neurological).

Serious Skin Reactions: There have been post-marketing reports of erythema multiforme and severe skin reactions [e.g., Stevens-Johnson Syndrome (SJS), toxic epidermal necrolysis (TEN)] associated with isotretinoin use. These events may be serious and result in death, life-threatening events, hospitalization or disability. Patients should be monitored closely for severe skin reactions and discontinuation of Amnesteem should be considered if warranted.

Pancreatitis: Acute pancreatitis has been reported in patients with either elevated or normal serum triglyceride levels. In rare instances, fatal hemorrhagic pancreatitis has been reported. Amnesteem should be stopped if hypertriglyceridemia cannot be controlled at an acceptable level or if symptoms of pancreatitis occur.

Lipids: Elevations of serum triglycerides in excess of 800 mg/dL have been reported in patients treated with Amnesteem. Marked elevations of serum triglycerides were reported in approximately 25% of patients receiving Amnesteem in clinical trials. In addition, approximately 15% developed a decrease in high-density lipoproteins and about 7% showed an increase in cholesterol levels. In clinical trials, the effects on triglycerides, HDL and cholesterol were reversible upon cessation of Amnesteem therapy. Some patients have been able to reverse triglyceride elevation by reduction in weight, restriction of dietary fat and alcohol, and reduction in dose while continuing Amnesteem.⁵

Blood lipid determinations should be performed before Amnesteem is given and then at intervals until the lipid response to Amnesteem is established, which usually occurs within 4 weeks. Especially caution should be given to patients who may be at high risk benefit for patients with cardiovascular history (patients with diabetes, obesity, increased alcohol intake, lipid metabolism disorder or familial history of lipid metabolism disorder). If Amnesteem therapy is instituted, more frequent checks of serum values for lipids and/or blood sugar are recommended (see PRECAUTIONS: Laboratory Tests).

The cardiovascular consequences of hypertriglyceridemia associated with Amnesteem are unknown.

Animal Studies: In rats given 8 or 32 mg/kg/day of isotretinoin (1.3 to 5.3 times the recommended clinical dose of 1 mg/kg/day after normalization for total body surface area) for 18 months or longer, the incidences of focal calcification, fibrosis and inflammation of the myocardium, calcification of coronary, pulmonary and mesenteric arteries, and metastatic calcification of the gastric mucosa were greater than in control rats of similar age. Focal endocardial and myocardial calcifications associated with calcification of the coronary arteries were observed in two dogs after approximately 6 to 7 months of treatment with isotretinoin at a dosage of 60 to 120 mg/kg/day (30 to 60 times the recommended clinical dose of 1 mg/kg/day, respectively, after normalization for total body surface area).

Hearing Impairment: Impaired hearing has been reported in patients taking Amnesteem. In some cases, the hearing impairment has been reported to persist after Amnesteem treatment has been stopped. Mechanism(s) and causality for this event have not been established. Patients who experience tinnitus or hearing impairment should discontinue Amnesteem treatment and be referred for specialized care for further evaluation (see ADVERSE REACTIONS: Special Senses).

Hepatotoxicity: Clinical hepatitis considered to be possibly or probably related to Amnesteem therapy has been reported. Additionally, mild to moderate elevations of liver enzymes have been observed in approximately 15% of individuals treated during clinical trials, some of which normalized with dosage reduction or continued administration of the drug. If normalization does not readily occur or if hepatitis is suspected during treatment with Amnesteem, the drug should be discontinued and the etiology further investigated.

Inflammatory Bowel Disease: Amnesteem has been associated with inflammatory bowel disease (including regional ileitis) in patients without a prior history of intestinal disorders. In some instances, symptoms have been reported to persist after Amnesteem treatment has been stopped. Patients experiencing abdominal pain, rectal bleeding or severe diarrhea should discontinue Amnesteem immediately (see ADVERSE REACTIONS: Gastrointestinal).

Skeletal: Bone Mineral Density: Effects of multiple courses of Amnesteem on the developing musculoskeletal system are unknown. There is some evidence that long-term, high dose, or multiple courses of therapy with isotretinoin have more of an effect than a single course of therapy on the musculoskeletal system. In an open-label clinical trial (N = 217) of a single course of therapy with Amnesteem for severe recalcitrant nodular acne, bone density measurements at several skeletal sites were not significantly decreased (lumbar spine change > -4% and total hip change > -5%) or were increased in the majority of patients. One patient had a decrease in lumbar spine bone mineral density > 4% based on unadjusted data. Sixteen (7.3%) patients had decreases in lumbar spine bone mineral density > 4%, and all the other patients (92%) did not have significant decreases or had increases (adjusted for body mass index). Nine patients (4.5%) had a decrease in total hip bone mineral density > 5% based on unadjusted data. Twenty one (10.6%) patients had decreases in total hip bone mineral density > 5%, and all the other patients (89%) did not have significant decreases or had increases (adjusted for body mass index). Follow-up studies performed in eight of the patients with decreased bone mineral density for up to 11 months thereafter demonstrated increasing bone density in five patients at the lumbar spine, while for the other three patients had lumbar spine bone density measurements below baseline values. Total hip bone mineral densities remained below baseline (range –1.6% to –7.6%) in five of eight patients (62.5%).

In a separate open-label extension study of ten patients, ages 13 to 18 years, who started a second course of Amnesteem 4 months after the first course, two patients showed a decrease in mean lumbar spine bone density from 0.25% to 0.25% (see PRECAUTIONS: Laboratory Tests).

Spontaneous reports of osteoporosis, osteopenia, bone fractures and delayed healing of bone fractures have been seen in the Amnesteem population. While causality to Amnesteem has not been established, an effect cannot be ruled out. Longer term effects have not been studied. It is important that Amnesteem be given at the recommended doses for no longer than the recommended duration.

Hyperostosis: A high prevalence of skeletal hyperostosis was noted in clinical trials for disorders of keratinization with a mean dose of 2.24 mg/kg/day. Additionally, skeletal hyperostosis was noted in six of eight patients in a prospective study of disorders of keratinization.⁵ Minimal skeletal hyperostosis and calcification of ligaments and tendons have also been observed by *in vivo* in prospective studies of nodu-

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lar acne patients treated with a single course of therapy at recommended doses. The skeletal effects of multiple Amnesteem treatment courses for acne are unknown.

In a clinical study of 217 pediatric patients (12 to 17 years) with severe recalcitrant nodular acne, hyperostosis was not observed after 16 to 20 weeks of treatment with approximately 1 mg/kg/day of Amnesteem given in two divided doses. Hyperostosis may require a longer time frame to appear. The clinical course and significance remain unknown.

Premature Epiphyseal Closure: There are spontaneous reports of premature epiphyseal closure in acne patients receiving recommended doses of Amnesteem. The effect of multiple courses of Amnesteem on epiphyseal closure is unknown.

Vision Impairment: Visual problems should be carefully monitored. All Amnesteem patients experiencing visual difficulties should discontinue Amnesteem treatment and have an ophthalmological examination (see ADVERSE REACTIONS: Special Senses).

Corneal Opacities: Corneal opacities have occurred in patients receiving Amnesteem for acne and more frequently when higher drug dosages were used in patients with disorders of keratinization. The corneal opacities that have been observed in clinical trial patients treated with Amnesteem have either completely resolved or were resolving at follow-up 6 to 7 weeks after discontinuation of the drug (see ADVERSE REACTIONS: Special Senses).

Decreased Night Vision: Decreased night vision has been reported during Amnesteem therapy and in some instances the event has persisted after therapy was discontinued. Because the onset in some patients was sudden, patients should be advised of this potential problem and warned to be cautious when driving or operating any vehicle at night.

PRECAUTIONS: Amnesteem must only be prescribed by prescribers who are registered and activated with the iPLEDGE program. Amnesteem must only be dispensed by a pharmacy registered and activated with iPLEDGE, and must only be dispensed to patients who are registered and meet all the requirements of iPLEDGE. Registered and activated pharmacies must receive Amnesteem only from wholesalers registered with iPLEDGE.

iPLEDGE program requirements for wholesalers, prescribers and pharmacists are described below:
Wholesalers: For the purpose of the iPLEDGE program, the term wholesaler refers to wholesaler, distributor and/or chain pharmacy distributor. To distribute Amnesteem, wholesalers must be registered with iPLEDGE and agree to meet all iPLEDGE requirements for wholesale distribution of isotretinoin products. Wholesalers must register with iPLEDGE by signing and returning the iPLEDGE wholesaler agreement that affirms they will comply with all iPLEDGE requirements for distribution of isotretinoin. These include:

- Registering prior to distributing isotretinoin and re-registering annually thereafter
- Distributing only FDA approved isotretinoin product
- Only shipping isotretinoin to
 - wholesalers registered in the iPLEDGE program with prior written consent from the manufacturer
 - pharmacies licensed in the US and registered and activated in the iPLEDGE program
- Notifying the isotretinoin manufacturer (or delegate) of any non-registered and/or non-activated pharmacy or unregistered wholesaler that attempts to order isotretinoin
- Complying with inspection of wholesaler records for verification of compliance with the iPLEDGE program by the isotretinoin manufacturer (or delegate)
- Returning to the manufacturer (or delegate) any undistributed product if registration is revoked by the manufacturer or if the wholesaler chooses to not register annually

Prescribers: To prescribe isotretinoin, the prescriber must be registered and activated with the pregnancy risk management program iPLEDGE. Prescribers can register by signing and returning the completed registration form. Prescribers can only activate their registration by affirming that they meet requirements and will comply with all iPLEDGE requirements by attesting to the following points:

- I know the risk and severity of fetal injury/birth defects from isotretinoin.
- I know the risk factors for unplanned pregnancy and the effective measures for avoidance of unplanned pregnancy.
- I have the expertise to provide the patient with detailed pregnancy prevention counseling or I will refer her to an expert for such counseling, reimbursed by the manufacturer.
- I will comply with the iPLEDGE program requirements described in the booklets entitled *The Guide to Best Practices for the iPLEDGE Program* and *The iPLEDGE Program Prescriber Contraception Counseling Guide*.
- Before beginning treatment of female patients of child bearing potential with isotretinoin and on a monthly basis, the patient will be counseled to avoid pregnancy by using two forms of contraception simultaneously and continuously one month before, during and one month after isotretinoin therapy, unless the patient commits to continuous abstinence.
- I will not prescribe isotretinoin to any female patient of childbearing potential until verifying she has a negative screening pregnancy test and monthly negative CLIA-certified (Clinical Laboratory Improvement Amendment) pregnancy tests. Patients should have a pregnancy test at the completion of the entire course of isotretinoin capsules and another pregnancy test one month later.
- I will report any pregnancy case that I become aware of while the female patient is on isotretinoin or one month after the last dose to the pregnancy registry.

To prescribe isotretinoin, the Prescriber must access the iPLEDGE system via the internet (www.ipledgeprogram.com) or telephone (1-866-495-0654) to:

- Register each patient in the iPLEDGE program.
- Confirm monthly that each patient has received counseling and education.
- For *female patients of childbearing potential*:
 - Enter patient's two chosen forms of contraception each month.
 - Enter monthly result from CLIA-certified laboratory conducted pregnancy test.

Isotretinoin must only be prescribed to female patients who are known not to be pregnant as confirmed by a negative CLIA-certified laboratory conducted pregnancy test.

Isotretinoin must only be dispensed by a pharmacy registered and activated with the pregnancy risk management program iPLEDGE and only when the registered patient meets all the requirements of the iPLEDGE program. Meeting the requirements for a female patient of childbearing potential signifies that she:

- Has been counseled and has signed a Patient Information/Informed Consent About Birth Defects (for female patients who can get pregnant) form that contains warnings about the risk of potential birth defects if the fetus is exposed to isotretinoin. The patient must sign the informed consent form before starting treatment and patient counseling must also be done at that time and on a monthly basis thereafter.
- Has had two negative urine or serum pregnancy tests with a sensitivity of at least 25 mIU/mL before receiving the initial isotretinoin prescription. The first test (a screening test) is obtained by the prescriber when the decision is made to pursue qualification of the patient for isotretinoin. The second pregnancy test (a confirmation test) must be done in a CLIA-certified laboratory. The interval between the two tests should be at least 19 days.
 - For patients with regular menstrual cycles, the second pregnancy test should be done during the first 5 days of the menstrual period immediately preceding the beginning of isotretinoin therapy and after the patient has used two forms of contraception for one month.
 - For patients with amenorrhea, irregular cycles or using a contraceptive method that precludes withdrawal bleeding, the second pregnancy test must be done immediately preceding the beginning of isotretinoin therapy and after the patient has used two forms of contraception for one month.
- Has had a negative result from a urine or serum pregnancy test in a CLIA-certified laboratory before receiving each subsequent course of isotretinoin. A pregnancy test must be repeated every month, in a CLIA-certified laboratory, prior to the female patient receiving each prescription.
- Has selected and has committed to use two forms of effective contraception simultaneously, at least one of which must be a primary form, unless the patient commits to continuous abstinence for heterosexual contact, or the patient has undergone a hysterectomy or bilateral oophorectomy, or has been medically confirmed to be post-menopausal. Patients must use two forms of effective contraception for at least one month prior to initiation of isotretinoin therapy, during isotretinoin therapy and for one month after discontinuing isotretinoin therapy. Counseling about contraception and behaviors associated with an increased risk of pregnancy must be repeated on a monthly basis.

If the patient has unprotected heterosexual intercourse at any time one month before, during or one month after therapy, she must:

- Stop taking Amnesteem immediately, if on therapy
- Have a pregnancy test at least 19 days after the last act of unprotected heterosexual intercourse
- Start using two forms of effective contraception simultaneously again for one month before resuming Amnesteem therapy
- Have a second pregnancy test after using two forms of effective contraception for one month as described above depending on whether she has regular menses or not.

Primary forms	Secondary forms
tubal sterilization	<i>Barrier:</i>
partner's vasectomy	• male latex condom with or without spermicide
intrauterine device	• diaphragm with spermicide
hormonal (combination oral contraceptives, transdermal patch, injectables, implantables or vaginal ring)	• cervical cap with spermicide
	<i>Other:</i>
	• vaginal sponge (contains spermicide)

Any birth control method can fail. There have been reports of pregnancy from female patients who have used oral contraceptives, as well as transdermal patch/injectable/implantable/vaginal ring hormonal birth control products; these pregnancies occurred while these patients were taking Amnesteem. These reports are more frequent for female patients who use only a single method of contraception. Therefore, it is critically important that female patients of childbearing potential use two effective forms of contraception simultaneously. Patients must receive written warnings about the rates of possible contraception failure (included in patient education kits).

Using two forms of contraception simultaneously substantially reduces the chances that a female will become pregnant over the risk of pregnancy with either form alone. A drug interaction that decreases effectiveness of hormonal contraceptives has not been entirely ruled out for Amnesteem (see PRECAUTIONS: Drug Interactions). Although hormonal contraceptives are highly effective, prescribers are advised to consult the package insert of any medication administered concomitantly with hormonal contraceptives, since some medications may decrease the effectiveness of these birth control products.

Patients should be prospectively cautioned not to self-medicate with the herbal supplement St. John's Wort because a possible interaction has been suggested with hormonal contraceptives based on reports of breakthrough bleeding on oral contraceptives shortly after starting St. John's Wort. Pregnancies have been reported by users of combined hormonal contraceptives who also used some forma

If a pregnancy does occur during Amnesteem treatment, Amnesteem must be discontinued immediately. The patient should be referred to an Obstetrician-Gynecologist experienced in reproductive toxicity for further evaluation and counseling. Any suspected fetal exposure during or one month after

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Amnesteem therapy must be reported immediately to the FDA via the MedWatch number 1-800-FDA-1088 and also to the iPLEDGE pregnancy registry at 1-866-495-0654 or via the internet (www.ipledge-program.com).

All Patients: Isotretinoin is contraindicated in female patients who are pregnant. To receive isotretinoin all patients must meet all of the following conditions:

- Must be registered with the iPLEDGE program by the prescriber
- Must understand that severe birth defects can occur with the use of isotretinoin by female patients
- Must be reliable in understanding and carrying out instructions
- Must sign a Patient Information/Informed Consent (for all patients) form that contains warnings about the potential risks associated with isotretinoin
- Must fill and pick up the prescription within 7 days of the date of specimen collection for the pregnancy test for female patients of child bearing potential
- Must fill and pick up the prescription within 30 days of the office visit for male patients and female patients not of child bearing potential
- Must not donate blood while on isotretinoin and for one month after treatment has ended
- Must not share isotretinoin with anyone, even someone who has similar symptoms

Female Patients of Childbearing Potential: Isotretinoin is contraindicated in female patients who are pregnant. In addition to the requirements for all patients described above, female patients of childbearing potential must meet the following conditions:

- Must NOT be pregnant or breast-feeding
- Must comply with the required pregnancy testing at a CLIA-certified laboratory
- Must fill and pick up the prescription within 7 days of the date of specimen collection for the pregnancy test
- Must be capable of complying with the mandatory contraceptive measures required for isotretinoin therapy, or commit to continuous abstinence from heterosexual intercourse and understand behaviors associated with an increased risk of pregnancy
- Must understand that it is her responsibility to avoid pregnancy one month before, during and one month after isotretinoin therapy
- Must have signed an additional Patient Information/Informed Consent About Birth Defects (for female patients who can get pregnant) form, before starting isotretinoin, that contains warnings about the risk of potential birth defects if the fetus is exposed to isotretinoin
- Must access the iPLEDGE system via the internet (www.ipledgeprogram.com) or telephone (1-866-495-0654), before starting isotretinoin, on a monthly basis during therapy and one month after the last dose to answer questions on the program requirements and to enter the patient's two chosen forms of contraception
- Must have been informed of the purpose and importance of providing information to the iPLEDGE program should she become pregnant while taking isotretinoin or within one month of the last dose

Pharmacists: To dispense isotretinoin, pharmacies must be registered and activated with the pregnancy risk management program iPLEDGE.

The Responsible Site Pharmacist must register the pharmacy by signing and returning the completed registration form. After registration, the Responsible Site Pharmacist can only activate the pharmacy registration by affirming that they meet requirements and will comply with all iPLEDGE requirements by attesting to the following points:

- I know the risk and severity of fetal injury/birth defects from isotretinoin.
- I will train all pharmacists, who participate in the filling and dispensing of isotretinoin prescriptions, on the iPLEDGE program requirements.
- I will comply and seek to ensure all pharmacists who participate in the filling

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returned to normal within 2 weeks and half returned to normal within 4 weeks. No cases of rhabdomyolysis were reported in this trial.

Carcinogenesis, Mutagenesis and Impairment of Fertility: In male and female Fischer 344 rats given oral isotretinoin at dosages of 8 or 32 mg/kg/day (1.3 to 5.3 times the recommended clinical dose of 1 mg/kg/day, respectively, after normalization for total body surface area) for greater than 18 months, there was a dose related increased incidence of pheochromocytoma relative to controls. The incidence of adrenal medullary hyperplasia was also increased at the higher dosage in both sexes. The relatively high level of spontaneous pheochromocytomas occurring in the male Fischer 344 rat makes it an equivocal model for study of this tumor; therefore, the relevance of this tumor to the human population is uncertain.

The Ames test was conducted with isotretinoin in two laboratories. The results of the tests in one laboratory were negative while in the second laboratory a weakly positive response (less than 1.6 x background) was noted in *S. typhimurium* TA100 when the assay was conducted with metabolic activation. No dose-response effect was seen and all other strains were negative. Additionally, other tests designed to assess genotoxicity (Chinese hamster cell assay, mouse micronucleus test, *S. cerevisiae* D7 assay, *in vitro* clastogenesis (Chinese hamster cell-derived lymphocytes and unscheduled DNA synthesis assay) were all negative.

In rats, no adverse effects on gonadal function, fertility, conception rate, gestation or parturition were observed at oral dosages of isotretinoin of 2, 8 or 32 mg/kg/day (0.3, 1.3 or 5.3 times the recommended clinical dose of 1 mg/kg/day, respectively, after normalization for total body surface area).

In dogs, testicular atrophy was noted after treatment with oral isotretinoin for approximately 30 weeks. The dosages of 10 or 30 mg/kg/day (10 or 30 times the recommended clinical dose of 1 mg/kg/day, respectively, after normalization for total body surface area). In general, there was microscopic evidence for appreciable depression of spermatogenesis but some sperm were observed in all testes examined and in no instance were completely atrophic tubules seen. In studies of 66 men, 30 of whom were patients with nodular acne under treatment with oral isotretinoin, no significant changes were noted in the count or motility of spermatozoa in the ejaculate. In a study of 50 men (age 17 to 32 years) receiving Amnesteem (isotretinoin) therapy for nodular acne, no significant effects were seen on ejaculate volume, sperm count, total sperm motility, morphology or seminal plasma fructose.

Pregnacy: Category X. See Boxed CONTRAINDICATIONS AND WARNINGS.

Nursing Mothers: It is not known whether this drug is excreted in human milk. Because of the potential for adverse effects, nursing mothers should not receive Amnesteem.

Pediatric Use: The use of Amnesteem in pediatric patients less than 12 years of age has not been studied. The use of Amnesteem for the treatment of severe recalcitrant nodular acne in pediatric patients ages 12 to 17 years should be given careful consideration, especially for those patients where a known metabolic or structural abnormality exists (see PRECAUTIONS: General). Use of Amnesteem in this age group for severe recalcitrant nodular acne is supported by evidence from a clinical study comparing 103 pediatric patients (13 to 17 years) to 197 adult patients (≥ 18 years). Results from this study demonstrated that Amnesteem, at a dose of 1 mg/kg/day given in two divided doses, was equally effective in treating severe recalcitrant nodular acne in both pediatric and adult patients.

In studies with Amnesteem, adverse reactions reported in pediatric patients were similar to those described in adults except for the increased incidence of back pain and arthralgia (both of which were sometimes severe) and myalgia in pediatric patients (see ADVERSE REACTIONS).

In an open-label clinical trial (N = 217) of a single course of therapy with Amnesteem for severe recalcitrant nodular acne, bone density measurements at several skeletal sites were not significantly decreased (lumbar spine change > 4% and total hip change > 5%) or were increased in the majority of patients. One patient had a decrease in lumbar spine bone mineral density > 4% based on unadjusted data. Sixteen (7.3%) patients had decreases in lumbar spine bone mineral density > 4%, and all the other patients (92%) did not have significant decreases or had increases (adjusted for body mass index). Nine patients (4.5%) had a decrease in total hip bone mineral density > 5% based on unadjusted data. Twenty-one (10.6%) patients had decreases in total hip bone mineral density > 5%, and all the other patients (89%) did not have significant decreases or had increases (adjusted for body mass index). Follow-up studies performed in eight of the patients with decreased bone mineral density for up to 11 months there- after demonstrated increasing bone density in five patients at the lumbar spine, while the other three patients had lumbar spine bone density measurements below baseline values. Total hip bone mineral densities remained below baseline (range –1.6% to –7.6%) in five of eight patients (62.5%).

In a separate open-label extension study of ten patients, in ages 13 to 18 years, who started a second course of Amnesteem 4 months after the first course, two patients showed a decrease in mean lumbar spine bone mineral density up to 3.25% (see WARNINGS: Skeletal: Bone Mineral Density).

Geriatric Use: Clinical studies of isotretinoin did not include sufficient numbers of subjects aged 65 years and over to determine whether they respond differently than younger subjects. Although reported clinical experience has not identified differences in responses between elderly and younger patients, effects of aging might be expected to increase some risks associated with isotretinoin therapy (see WARNINGS and PRECAUTIONS).

ADVERSE REACTIONS: Clinical Trials and Post-marketing Surveillance: The adverse reactions listed below reflect the experience from investigational studies of Amnesteem, and the post-marketing experience. The relationship of some of the adverse events to Amnesteem therapy is unknown. Many of the side effects and adverse reactions seen in patients receiving Amnesteem are similar to those described in patients taking very high doses of vitamin A (dryness of the skin and mucous membranes, e.g., of the lips, nasal passage and eyes).

Dose Relationship: Chellitis and hypertriglyceridemia are usually dose related. Most adverse reactions reported in clinical trials were reversible when therapy was discontinued; however, some persisted after cessation of therapy (see WARNINGS and ADVERSE REACTIONS).

Body as a Whole: allergic reactions, including vasculitis, systemic hypersensitivity (see PRECAUTIONS: Hypersensitivity), edema, fatigue, lymphadenopathy, weight loss

Cardiovascular: palpitation, tachycardia, vascular thrombotic disease, stroke

Endocrine/Metabolic: hypertriglyceridemia (see WARNINGS: Lipids), alterations in blood sugar levels (see PRECAUTIONS: Laboratory Tests)

Gastrointestinal: inflammatory bowel disease (see WARNINGS: Inflammatory Bowel Disease), hepatitis (see WARNINGS: Hepatotoxicity), pancreatitis (see WARNINGS: Lipids), bleeding and inflammation of the gums, colitis, esophagitis/esophageal ulceration, ileitis, nausea, other nonspecific gastrointestinal symptoms

Hematology: allergic reactions (see PRECAUTIONS: Hypersensitivity), anemia, thrombocytopenia, neutropenia, rare reports of agranulocytosis (see PRECAUTIONS: Information for Patients). See PRECAUTIONS: Laboratory Tests for other hematological parameters

Musculoskeletal: skeletal hyperostosis, calcification of tendons and ligaments, premature epiphyseal closure, decreases in bone mineral density (see WARNINGS: Skeletal), musculoskeletal symptoms (sometimes severe) including back pain, myalgia, and arthralgia (see PRECAUTIONS: Information for Patients), transient pain in the chest (see PRECAUTIONS: Information for Patients), arthritis, tendonitis, other types of bone abnormalities, elevations of CPK/rare reports of rhabdomyolysis (see PRECAUTIONS: Laboratory Tests)

Neurological: pseudotumor cerebri (see WARNINGS: Pseudotumor Cerebri), dizziness, drowsiness, headache, insomnia, lethargy, malaise, nervousness, paresthesias, seizures, stroke, syncope, weakness

Psychiatric: suicidal ideation, suicide attempts, suicide, depression, psychosis, aggression, violent behaviors (see WARNINGS: Psychiatric Disorders), emotional instability

Of the patients reporting depression, some reported that the depression subsided with discontinuation of therapy and recurred with reinstatement of therapy.

Reproductive System: abnormal menses

Respiratory: bronchospasms (with or without a history of asthma), respiratory infection, voice alteration

Skin and Appendages: acne fulminans, alopecia (which in some cases persists), bruising, chellitis (dry lips), dry mouth, dry nose, dry skin, epistaxis, eruptive xanthomas,⁷ erythema multiforme, flushing, fragility of skin, hair abnormalities, hirsutism, hyperpigmentation and hypopigmentation, infections (including disseminated herpes simplex), nail dystrophy, paronychia, peeling of palms and soles, photoallergic/photosensitizing reactions, pruritus, pyogenic granuloma, rash (including facial erythema, seborrhea, and eczema), Stevens-Johnson Syndrome, sunburn susceptibility increased, sweating, toxic epidermal necrolysis, urticaria, vasculitis (including Wegener's granulomatosis; see PRECAUTIONS: Hypersensitivity) abnormal wound healing (delayed wound healing or exuberant granulation tissue with crusting; see PRECAUTIONS: Information for Patients)

Special Senses: Hearing: hearing impairment (see WARNINGS: Hearing Impairment), tinnitus

Vision: corneal opacities (see WARNINGS: Corneal Opacities), decreased night vision which may persist (see WARNINGS: Decreased Night Vision), cataracts, color vision disorder, conjunctivitis, dry eyes, eyelid inflammation, keratitis, optic neuritis, photophobia, visual disturbances

Urinary System: glomerulonephritis (see PRECAUTIONS: Hypersensitivity), nonspecific urological findings (see PRECAUTIONS: Laboratory Tests for other urological parameters)

Laboratory: Elevation of plasma triglycerides (see WARNINGS: Lipids), decrease in serum high-density lipoprotein (HDL) levels, elevations of serum cholesterol during treatment

⁷ Increased alkaline phosphatase, SGOT (AST), SGPT (ALT), GGTp or LDH (see WARNINGS: Hepatotoxicity)

⁸ Elevation of fasting blood sugar, elevations of CPK (see PRECAUTIONS: Laboratory Tests), hyperuricemia

Decreases in red blood cell parameters, decreases in white blood cell counts (including severe neutropenia and rare reports of agranulocytosis; see PRECAUTIONS: Information for Patients), elevated sedimentation rates, elevated platelet counts, thrombocytopenia

White cells in the urine, proteinuria, microscopic or gross hematuria

OVERDOSAGE: The oral LD₅₀ of isotretinoin is greater than 4000 mg/kg in rats and mice (> 600 times the recommended clinical dose of 1 mg/kg/day after normalization of the rat dose for total body surface area and > 300 times the recommended clinical dose of 1 mg/kg/day after normalization of the mouse dose for total body surface area) and is approximately 1960 mg/kg in rabbits (653 times the recommended clinical dose of 1 mg/kg/day after normalization for total body surface area). In humans, overdose has been associated with vomiting, facial flushing, chelliosis, abdominal pain, headache, dizziness and ataxia. These symptoms quickly resolve without apparent residual effects.

Amnesteem causes serious birth defects at any dosage (see Boxed CONTRAINDICATIONS AND WARNINGS). Female patients of childbearing potential who present with isotretinoin overdose must be evaluated for pregnancy. Patients who are pregnant should receive counseling about the risks to the fetus, as described in the Boxed CONTRAINDICATIONS AND WARNINGS. Non-pregnant patients must be warned to avoid pregnancy for at least one month and receive contraceptive counselling as described in PRECAUTIONS. Educational materials for such patients can be obtained by calling the manufacturer. Because an overdose would be expected to result in higher levels of isotretinoin in semen than found during a normal treatment course, male patients should use a condom, or avoid reproductive sexual activity with a female patient who is or might become pregnant, for one month after the overdose. All patients with isotretinoin overdose should not donate blood for at least one month.

DOSEAGE AND ADMINISTRATION: Amnesteem should be administered with a meal (see PRECAUTIONS: Information for Patients).

The recommended dosage range for Amnesteem is 0.5 to 1 mg/kg/day given in two divided doses with food for 15 to 20 weeks. In studies comparing 0.1, 0.5 and 1 mg/kg/day,⁸ it was found that all dosages provided initial clearing of disease, but there was a greater need for retreatment with the lower dosages. During treatment, the dose may be adjusted according to response of the disease and/or the appearance of clinical side effects — some of which may be dose related. Adult patients whose disease

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is very severe with scarring or is primarily manifested on the trunk may require dose adjustments up to 2 mg/kg/day, as tolerated. Failure to take Amnesteem with food will significantly decrease absorption. Before upward dose adjustments are made, the patients should be questioned about their compliance with food instructions.

The safety of once daily dosing with Amnesteem has not been established. Once daily dosing is **not** recommended.

If the total nodule count has been reduced by more than 70% prior to completing 15 to 20 weeks of treatment, the drug may be discontinued. After a period of 2 months or more off therapy, and if warranted by persistent or recurring severe nodular acne, a second course of therapy may be initiated. The optimal interval before retreatment has not been defined for patients who have not completed skeletal growth. Long-term use of Amnesteem, even in low doses, has not been studied, and is not recommended. It is important that Amnesteem be given at the recommended doses for no longer than the recommended duration. The effect of long-term use of Amnesteem on bone loss is unknown (see WARNINGS: Skeletal: Bone Mineral Density, Hyperostosis, and Premature Epiphyseal Closure).

Contraceptive measures must be followed for any subsequent course of therapy (see PRECAUTIONS).

Table 4. Amnesteem Dosing by Body Weight (Based on Administration with Food)

Body Weight		Total mg/day		
kilograms	pounds	0.5 mg/kg	1 mg/kg	2 mg/kg*
40	88	20	40	80
50	110	25	50	100
60	132	30	60	120
70	154	35	70	140
80	176	40	80	160
90	198	45	90	180
100	220	50	100	200

*See DOSAGE AND ADMINISTRATION: the recommended dosage range is 0.5 to 1 mg/kg/day.

INFORMATION FOR PHARMACISTS	
Access the iPLEDGE system via the internet (www.ipledgeprogram.com) or telephone (1-866-495-0654) to obtain an authorization and the “do not dispense to patient after” date. Amnesteem must only be dispensed in no more than a 30 day supply.	
REFILLS REQUIRE A NEW PRESCRIPTION AND A NEW AUTHORIZATION FROM THE iPLEDGE SYSTEM.	
An Amnesteem Medication Guide must be given to the patient each time Amnesteem is dispensed, as required by law. This Amnesteem Medication Guide is an important part of the risk management program for the patient.	

HOW SUPPLIED: Amnesteem (isotretinoin capsules, USP) contain 10 mg, 20 mg or 40 mg of isotretinoin, USP.

The 10 mg capsules are reddish brown and imprinted with **110**. They are available as follows:

NDC 0378-6611-93

Cartons of 30 containing 3 Prescription Packs of 10 capsules

The 20 mg capsules are reddish brown and cream and imprinted with **120**. They are available as follows:

NDC 0378-6612-93

Cartons of 30 containing 3 Prescription Packs of 10 capsules

The 40 mg capsules are orange-brown and imprinted with **140**. They are available as follows:

NDC 0378-6614-93

Cartons of 30 containing 3 Prescription Packs of 10 capsules

NDC 0378-6614-88

Cartons of 100 containing 10 Prescription Packs of 10 capsules

Storage: Store at 20° to 25°C (68° to 77°F). [See USP Controlled Room Temperature.]

Protect from light.

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- Strauss JS, Rapini RP, Shailta AR, et al. Isotretinoin therapy for acne: results of a multicenter dose-response study. *J Am Acad Dermatol* 10:490-496, 1984.

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PATIENT INFORMATION/INFORMED CONSENT ABOUT BIRTH DEFECTS (for female patients who can get pregnant)

To be completed by the patient (and her parent or guardian* if patient is under age 18) and signed by her doctor.

Read each item below and initial in the space provided to show that you understand each item and agree to follow your doctor's instructions. **Do not sign this consent and do not take isotretinoin if there is anything that you do not understand.**

*A parent or guardian of a minor patient (under age 18) must also read and initial each item before signing the consent.

- | | |
|-------|------------------|
| _____ | (Patient's Name) |
|-------|------------------|
- I understand that there is a very high chance that my unborn baby could have severe birth defects if I am pregnant or become pregnant while taking isotretinoin. This can happen with any amount and even if taken for short periods of time. This is why I must not be pregnant while taking isotretinoin.

Initials: _____
 - I understand that I must not get pregnant one month before, during the entire time of my treatment and for one month after the end of my treatment with isotretinoin.

Initials: _____
 - I understand that I must avoid sexual intercourse completely, or I must use two separate, effective forms of birth control (contraception) **at the same time.** The only exceptions are if I have had surgery to remove the uterus (a hysterectomy) or both of my ovaries (bilateral oophorectomy), or my doctor has medically confirmed that I am post-menopausal.

Initials: _____
 - I understand that hormonal birth control products are among the most effective forms of birth control. Combination birth control pills and other hormonal products include skin patches, shots, under-the-skin implants, vaginal rings and intrauterine devices (IUDs). Any form of birth control can fail. That is why I must use two different birth control methods at the same time starting one month before, during, and for one month after stopping therapy every time I have sexual intercourse, even if one of the methods I choose is hormonal birth control.

Initial: _____
 - I understand that the following are effective forms of birth control:

Primary forms	Secondary forms
• tubal sterilization (tying my tubes)	<i>Barrier:</i>
• partner's vasectomy	• male latex condom with or without spermicide
• intrauterine device	• diaphragm with spermicide
• hormonal (combination birth control pills, skin patches, shots, under-the-skin implants or vaginal ring)	<i>Other:</i>
	• vaginal sponge (contains spermicide)

A diaphragm and cervical cap must each be used with spermicide, a special cream that kills sperm
I understand that at least one of my two forms of birth control must be a primary method.

Initials: _____
 - I will talk with my doctor about any medicines including herbal products I plan to take during my isotretinoin treatment because hormonal birth control methods may not work if I am taking certain medicines or herbal products.

Initials: _____
 - I may receive a free birth control counseling session from a doctor or other family planning expert. My isotretinoin doctor can give me an isotretinoin Patient Referral Form for this free consultation.

Initials: _____
 - I must begin using the birth control methods I have chosen as described above at least one month before I start taking isotretinoin.

Initials: _____
 - I cannot get my first prescription for isotretinoin unless my doctor has told me that I have two negative pregnancy test results. The first pregnancy test should be done when my doctor decides to prescribe isotretinoin. The second pregnancy test must be done in a lab during the first 5 days of my menstrual period right before starting isotretinoin therapy treatment or as instructed by my doctor. I will then have one pregnancy test, in a lab.
 - every month during treatment
 - at the end of treatment
 - and 1 month after stopping treatment
- I must not start taking isotretinoin until I am sure that I am not pregnant, have negative results from two pregnancy tests, and the second test has been done in a lab.
- Initials: _____

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10. I have read and understand the materials my doctor has given to me, including *The iPLEDGE Program Guide for Isotretinoin for Female Patients Who Can Get Pregnant*, *The iPLEDGE Birth Control Workbook* and *The iPLEDGE Program Patient Introductory Brochure*

My doctor gave me and asked me to watch the DVD containing a video about birth control and a video about birth defects and isotretinoin.

I was told about a private counseling line that I may call for more information about birth control. I have received information on emergency birth control.

Initial: _____

11. I must stop taking isotretinoin right away and call my doctor if I get pregnant, miss my expected menstrual period, stop using birth control or have sexual intercourse without using my two birth control methods at any time.

Initials: _____

12. My doctor gave me information about the purpose and importance of providing information to the iPLEDGE program should I become pregnant while taking isotretinoin or within one month of the last dose. I also understand that if I become pregnant, information about my pregnancy, my health, and my baby's health may be shared with the maker of isotretinoin and their authorized parties who maintain the iPLEDGE program and government regulatory authorities.

Initials: _____

13. I understand that being qualified to receive isotretinoin in the iPLEDGE program means that I:

- have had two negative urine or blood pregnancy tests before receiving the first isotretinoin prescription. The second test must be done in a lab. I must have a negative result from a urine or blood pregnancy test done in a lab repeated each month before I receive another isotretinoin prescription.
- have chosen and agreed to use two forms of effective birth control at the same time. At least one method must be a primary form of birth control, **unless I have chosen never to have sexual contact with a male (abstinence)**, or I have undergone a hysterectomy. I must use two forms of birth control for at least one month before I start isotretinoin therapy, during therapy and for one month after stopping therapy. I must receive counseling, repeated on a monthly basis, about birth control and behaviors associated with an increased risk of pregnancy.
- have signed a Patient Information/Informed Consent About Birth Defects (for female patients who can get pregnant) that contains warnings about the chance of possible birth defects if I am pregnant or become pregnant and my unborn baby is exposed to isotretinoin.
- am been informed of and understand the purpose and importance of providing information to the iPLEDGE program should I become pregnant while taking isotretinoin or within one month of the last dose.
- have interacted with the iPLEDGE program before starting isotretinoin and on a monthly basis to answer questions on the program requirements and to enter my two chosen forms of birth control.

Initials: _____
My doctor has answered all my questions about isotretinoin and I understand that it is my responsibility not to get pregnant one month before, during isotretinoin treatment, or for one month after I stop taking isotretinoin.

Initials: _____

I now authorize my doctor _____ to begin my treatment with isotretinoin.

Patient Signature: _____ Date: _____
Parent/Guardian Signature (if under age 18): _____ Date: _____
Please print: Patient Name and Address _____
_____ Telephone _____

I have fully explained to the patient, _____, the nature and purpose of the treatment described above and the risks to female patients of childbearing potential. I have asked the patient if she has any questions regarding her treatment with isotretinoin and have answered those questions to the best of my ability.

Doctor Signature: _____ Date: _____

PLACE THE ORIGINAL SIGNED DOCUMENTS IN THE PATIENT'S MEDICAL RECORD. PLEASE PROVIDE A COPY TO THE PATIENT.

PATIENT INFORMATION/INFORMED CONSENT (for all patients):

To be completed by patient (and parent or guardian if patient is under age 18) and signed by the doctor. Read each item below and initial in the space provided if you understand each item and agree to follow your doctor's instructions. A parent or guardian of a patient under age 18 must also read and understand each item before signing the agreement.

Do not sign this agreement and do not take isotretinoin if there is anything that you do not understand about all the information you have received about using isotretinoin.

- I, _____ (Patient's Name) understand that isotretinoin is a medicine used to treat severe nodular acne that cannot be cleared up by any other acne treatments, including antibiotics. In severe nodular acne, many red, swollen, tender lumps form in the skin. If untreated, severe nodular acne can lead to permanent scars.

Initials: _____
- My doctor has told me about my choices for treating my acne.

Initials: _____
- I understand that there are serious side effects that may happen while I am taking isotretinoin. These have been explained to me. These side effects include serious birth defects in babies of pregnant patients. [Note: There is a second Patient Information/Informed Consent About Birth Defects (for female patients who can get pregnant).]

Initials: _____
- I understand that some patients, while taking isotretinoin or soon after stopping isotretinoin, have become depressed or developed other serious mental problems. Symptoms of depression include sad, "anxious" or empty mood, irritability, acting on dangerous impulses, anger, loss of pleasure or interest in social or sports activities, sleeping too much or too little, changes in weight or appetite, school or work performance going down or trouble concentrating. Some patients taking isotretinoin have had thoughts about hurting themselves or putting an end to their own lives (suicidal thoughts). Some people tried to end their own lives. And some people have ended their own lives. There were reports that some of these people did not appear depressed. There have been reports of patients on isotretinoin becoming aggressive or violent. No one knows if isotretinoin caused these behaviors or if they would have happened even if the person did not take isotretinoin. Some people have had other signs of depression while taking isotretinoin (see #7 below).

Initials: _____

- Before I start taking isotretinoin, I agree to tell my doctor if I have ever had symptoms of depression (see #7 below), been psychotic, attempted suicide, had any other mental problems or take medicine for any of these problems. Being psychotic means having a loss of contact with reality, such as hearing voices or seeing things that are not there.

Initials: _____
- Before I start taking isotretinoin, I agree to tell my doctor if, to the best of my knowledge, anyone in my family has ever had symptoms of depression, been psychotic, attempted suicide or had any other serious mental problems.

Initials: _____
- Once I start taking isotretinoin, I agree to stop using isotretinoin and tell my doctor right away if any of the following signs and symptoms of depression or psychosis happen. I:
 - start to feel sad or have crying spells
 - Loss interest in activities I once enjoyed
 - Sleep too much or have trouble sleeping
 - Become more irritable, angry, or aggressive than usual (for example, temper outbursts, thoughts of violence)
 - Have a change in my appetite or body weight
 - Have trouble concentrating
 - Withdraw from my friends or family
 - Feel like I have no energy
 - Have feelings of worthlessness or guilt
 - Start having thoughts about hurting myself or taking my own life (suicidal thoughts)
 - Start acting on dangerous impulses
 - Start seeing or hearing things that are not real

- Initials: _____
- Before I start taking isotretinoin, I agree to tell my doctor if, to the best of my knowledge, anyone in my family has ever had symptoms of depression, been psychotic, attempted suicide or had any other serious mental problems.

Initials: _____
- Once I start taking isotretinoin, I agree to stop using isotretinoin and tell my doctor right away if any of the following signs and symptoms of depression or psychosis happen. I:
 - start to feel sad or have crying spells
 - Loss interest in activities I once enjoyed
 - Sleep too much or have trouble sleeping
 - Become more irritable, angry, or aggressive than usual (for example, temper outbursts, thoughts of violence)
 - Have a change in my appetite or body weight
 - Have trouble concentrating
 - Withdraw from my friends or family
 - Feel like I have no energy
 - Have feelings of worthlessness or guilt
 - Start having thoughts about hurting myself or taking my own life (suicidal thoughts)
 - Start acting on dangerous impulses
 - Start seeing or hearing things that are not real

- Initials: _____
- I will not give blood while taking isotretinoin or for one month after I stop taking isotretinoin. I understand that if someone who is pregnant gets my donated blood, her baby may be exposed to isotretinoin and may be born with serious birth defects.

Initials: _____
- I have read *The iPLEDGE Program Patient Introductory Brochure*, and other materials my provider gave me containing important safety information about isotretinoin. I understand all the information I received.

Initials: _____
- My doctor and I have decided I should take isotretinoin. I understand that I must be qualified in the iPLEDGE program to have my prescription filled each month. I understand that I can stop taking isotretinoin at any time. I agree to tell my doctor if I stop taking isotretinoin.

Initials: _____

I now allow my doctor _____ to begin my treatment with isotretinoin.

AMNESTEEM® (Isotretinoin Capsules USP)

Patient Signature: _____ Date: _____

Parent/Guardian Signature (if under age 18): _____ Date: _____

Patient Name (print) _____

Patient Address (_____) Telephone (_____)

I have:

- fully explained to the patient, _____, the nature and purpose of isotretinoin treatment, including its benefits and risks
- given the patient the appropriate educational materials, *The iPLEDGE Program Patient Introductory Brochure* and asked the patient if he/she has any questions regarding his/her treatment with isotretinoin
- answered those questions to the best of my ability

Doctor Signature: _____ Date: _____

PLACE THE ORIGINAL SIGNED DOCUMENTS IN THE PATIENT'S MEDICAL RECORD. PLEASE PROVIDE A COPY TO THE PATIENT.

MEDICATION GUIDE

AMNESTEEM (AM-NES-TEAM) (Isotretinoin Capsules, USP)

Read the Medication Guide that comes with Amnesteem before you start taking it and each time you get a prescription. There may be new information. This information does not take the place of talking with your doctor about your medical condition or your treatment.

What is the most important information I should know about Amnesteem?

- Amnesteem® (Isotretinoin Capsules, USP) is used to treat a type of severe acne (nodular acne) that has not been helped by other treatments, including antibiotics.
 - Because Amnesteem can cause birth defects, Amnesteem is only for patients who can understand and agree to carry out all of the instructions in the iPLEDGE program.
 - Amnesteem may cause serious mental health problems.
1. **Birth defects (deformed babies), loss of a baby before birth (miscarriage), death of the baby and early (premature) births.** Female patients who are pregnant or who plan to become pregnant must not take Amnesteem. **Female patients must not get pregnant:**
 - for one month before starting Amnesteem
 - while taking Amnesteem
 - for one month after stopping Amnesteem.

If you get pregnant while taking Amnesteem, stop taking it right away and call your doctor. Doctors and patients should report all cases of pregnancy to:

- FDA MedWatch at 1-800-FDA-1088, and
 - the iPLEDGE pregnancy registry at 1-866-495-0654
2. **Serious mental health problems.** Amnesteem may cause:

- **depression**
- **psychosis** (seeing or hearing things that are not real)
- **suicide.** Some patients taking Amnesteem have had thoughts about hurting themselves or putting an end to their own lives (suicidal thoughts). Some people tried to end their own lives. And some people have ended their own lives.

Stop Amnesteem and call your doctor right away if you or a family member notices that you have any of the following signs and symptoms of depression or psychosis:

- start to feel sad or have crying spells
- lose interest in activities you once enjoyed
- sleep too much or have trouble sleeping
- become more irritable, angry, or aggressive than usual (for example, temper outbursts, thoughts of violence)
- have a change in your appetite or body weight
- have trouble concentrating
- withdraw from your friends or family
- feel like you have no energy
- have feelings of worthlessness or guilt
- start having thoughts about hurting yourself or taking your own life (suicidal thoughts)
- start acting on dangerous impulses
- start seeing or hearing things that are not real

After stopping Amnesteem, you may also need follow-up mental health care if you had any of these symptoms.

What is Amnesteem?

Amnesteem is a medicine taken by mouth to treat the most severe form of acne (nodular acne) that cannot be cleared up by any other acne treatments, including antibiotics. Amnesteem can cause serious side effects (see “**What is the most important information I should know about Amnesteem?**”). Amnesteem can only be:

- prescribed by doctors that are registered in the iPLEDGE program
- dispensed by a pharmacy that is registered with the iPLEDGE program
- given to patients who are registered in the iPLEDGE program and agree to do everything required in the program

What is severe nodular acne?

Severe nodular acne is when many red, swollen, tender lumps form in the skin. These can be the size of pencil erasers or larger. If untreated, nodular acne can lead to permanent scars.

Who should not take Amnesteem?

- **Do not take Amnesteem if you are pregnant, plan to become pregnant or become pregnant during Amnesteem treatment.** Amnesteem causes severe birth defects. See “**What is the most important information I should know about Amnesteem?**”
- **Do not take Amnesteem if you are allergic to anything in it.** See the end of this Medication Guide for a complete list of ingredients in Amnesteem.

What should I tell my doctor before taking Amnesteem?

Tell your doctor if you or a family member has any of the following health conditions:

- mental problems

- asthma
- liver disease
- diabetes
- heart disease
- bone loss (osteoporosis) or weak bones
- an eating problem called anorexia nervosa (where people eat too little)
- food or medicine allergies

Tell your doctor if you are pregnant or breast-feeding. Amnesteem must not be used by women who are pregnant or breast-feeding.

Tell your doctor about all of the medicines you take including prescription and non-prescription medicines, vitamins and herbal supplements. Amnesteem and certain other medicines can interact with each other, sometimes causing serious side effects. Especially tell your doctor if you take:

- **Vitamin A supplements.** Vitamin A in high doses has many of the same side effects as Amnesteem. Taking both together may increase your chance of getting side effects.
- **Tetracycline antibiotics.** Tetracycline antibiotics taken with Amnesteem can increase the chances of getting increased pressure in the brain.
- **Progestin-only birth control pills (mini-pills).** They may not work while you take Amnesteem. Ask your doctor or pharmacist if you are not sure what type you are using.
- **Dilantin (phenytoin).** This medicine taken with Amnesteem may weaken your bones.
- **Corticosteroid medicines.** These medicines taken with Amnesteem may weaken your bones.
- **St. John’s Wort.** This herbal supplement may make birth control pills work less effectively.

These medicines should not be used with Amnesteem unless your doctor tells you it is okay.

Know the medicines you take. Keep a list of them to show to your doctor and pharmacist. Do not take any new medicine without talking with your doctor.

How should I take Amnesteem?

- You must take Amnesteem exactly as prescribed. You must also follow all the instructions of the iPLEDGE program. Before prescribing Amnesteem, your doctor will:
 - explain the iPLEDGE program to you
 - have you sign the Patient Information/Informed Consent form (for all patients). Female patients who can get pregnant must also sign another consent form.

You will not be prescribed Amnesteem if you cannot agree to or follow all the instructions of the iPLEDGE program.

- You will get no more than a 30 day supply of Amnesteem at a time. This is to make sure you are following the Amnesteem iPLEDGE program. You should talk with your doctor each month about side effects.
- The amount of Amnesteem you take has been specially chosen for you. It is based on your body weight, and may change during treatment.
- Take Amnesteem 2 times a day with a meal, unless your doctor tells you otherwise. **Swallow your Amnesteem capsules whole with a full glass of liquid. Do not chew or suck on the capsule.** Amnesteem can hurt the tube that connects your mouth to your stomach (esophagus) if it is not swallowed whole.
- If you miss a dose, just skip that dose. Do **not** take two doses at the same time.
- If you take too much Amnesteem or overdose, call your doctor or poison control center right away.
- Your acne may get worse when you first start taking Amnesteem. This should last only a short while. Talk with your doctor if this is a problem for you.
- You must return to your doctor as directed to make sure you don’t have signs of serious side effects. Your doctor may do blood tests to check for serious side effects from Amnesteem. Female patients who can get pregnant will get a pregnancy test each month.
- Female patients who can get pregnant must agree to use two separate forms of effective birth control at the same time one month before, while taking and for one month after taking Amnesteem. **You must access the iPLEDGE system to answer questions about the program requirements and to enter your two chosen forms of birth control.** To access the iPLEDGE system, go to www.ipleadgeprogram.com or call 1-866-495-0654.

You must talk about effective birth control methods with your doctor or go for a free visit to talk about birth control with another doctor or family planning expert. Your doctor can arrange this [free](#) visit, which will be paid for by the company that makes Amnesteem.

If you have sex at any time without using two forms of effective birth control, get pregnant or miss your expected period, stop using Amnesteem and call your doctor right away.

What should I avoid while taking Amnesteem?

- **Do not get pregnant** while taking Amnesteem and for one month after stopping Amnesteem. See “**What is the most important information I should know about Amnesteem?**”
- **Do not breast-feed** while taking Amnesteem and for one month after stopping Amnesteem. We do not know if Amnesteem can pass through your milk and harm the baby.
- **Do not give blood** while you take Amnesteem and for one month after stopping Amnesteem. If someone who is pregnant gets your donated blood, her baby may be exposed to Amnesteem and may be born with birth defects.
- **Do not take other medicines or herbal products** with Amnesteem unless you talk to your doctor. See “**What should I tell my doctor before taking Amnesteem?**”
- **Do not drive at night until you know if Amnesteem has affected your vision.** Amnesteem may decrease your ability to see in the dark.
- **Do not have cosmetic procedures to smooth your skin, including waxing, dermabrasion, or laser procedures, while you are using Amnesteem and for at least 6 months after you stop.** Amnesteem can increase your chance of scarring from these procedures. Check with your doctor for advice about when you can have cosmetic procedures.
- **Avoid sunlight and ultraviolet lights** as much as possible. Tanning machines use ultraviolet lights. Amnesteem may make your skin more sensitive to light.
- **Do not share Amnesteem with other people.** It can cause birth defects and other serious health problems.

What are the possible side effects of Amnesteem?

- **Amnesteem can cause birth defects (deformed babies), loss of a baby before birth (miscarriage), death of the baby and early (premature) births.** See “**What is the most important information I should know about Amnesteem?**”
- **Amnesteem may cause serious mental health problems.** See “**What is the most important information I should know about Amnesteem?**”
- **serious brain problems.** Amnesteem can increase the pressure in your brain. This can lead to permanent loss of eyesight and, in rare cases, death. Stop taking Amnesteem and call your doctor right away if you get any of these signs of increased brain pressure:
 - bad headache
 - blurred vision
 - dizziness
 - nausea or vomiting
 - seizures (convulsions)
 - stroke
- **skin problems.** Skin rash can occur in patients taking Amnesteem. In some patients a rash can be serious. Stop using Amnesteem and call your doctor right away if you develop conjunctivitis (red or inflamed eyes, like “pink eye”), a rash with a fever, blisters on legs, arms or face and/or sores in your mouth, throat, nose, eyes, or if your skin begins to peel.
- **stomach area (abdomen) problems.** Certain symptoms may mean that your internal organs are being damaged. These organs include the liver, pancreas, bowel (intestines) and esophagus (connection between mouth and stomach). If your organs are damaged, they may not get better even after you stop taking Amnesteem. Stop taking Amnesteem and call your doctor if you get:
 - severe stomach, chest or bowel pain
 - trouble swallowing or painful swallowing
 - new or worsening heartburn
 - diarrhea
 - rectal bleeding
 - yellowing of your skin or eyes
 - dark urine
- **bone and muscle problems.** Amnesteem may affect bones, muscles, and ligaments and cause pain in your joints or muscles. Tell your doctor if you plan hard physical activity during treatment with Amnesteem. Tell your doctor if you get:
 - back pain
 - joint pain
 - broken bone. Tell all healthcare providers that you take Amnesteem if you break a bone.

Stop Amnesteem and call your doctor right away if you have muscle weakness. Muscle weakness with or without pain can be a sign of serious muscle damage.

Amnesteem may stop long bone growth in teenagers who are still growing.
- **hearing problems.** Stop using Amnesteem and call your doctor if your hearing gets worse or if you have ringing in your ears. Your hearing loss may be permanent.

- **vision problems.** Amnesteem may affect your ability to see in the dark. This condition usually clears up after you stop taking Amnesteem, but it may be permanent. Other serious eye effects can occur. Stop taking Amnesteem and call your doctor right away if you have any problems with your vision or dryness of the eyes that is painful or constant. If you wear contact lenses, you may have trouble wearing them while taking Amnesteem and after treatment.
- **lipid (fats and cholesterol in blood) problems.** Amnesteem can raise the level of fats and cholesterol in your blood. This can be a serious problem. Return to your doctor for blood tests to check your lipids and to get any needed treatment. These problems usually go away when Amnesteem treatment is finished.
- **serious allergic reactions.** Stop taking Amnesteem and get emergency care right away if you develop hives, a swollen face or mouth or have trouble breathing. Stop taking Amnesteem and call your doctor if you get a fever, rash or red patches or bruises on your legs.
- **blood sugar problems.** Amnesteem may cause blood sugar problems including diabetes. Tell your doctor if you are very thirsty or urinate a lot.
- **decreased red and white blood cells.** Call your doctor if you have trouble breathing, faint or feel weak.
- **The common, less serious side effects of Amnesteem** are dry skin, chapped lips, dry eyes and dry nose that may lead to nosebleeds. Call your doctor if you get any side effect that bothers you or that does not go away.

These are not all of the possible side effects with Amnesteem. Your doctor or pharmacist can give you more detailed information.

Call your doctor for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088.

How should I store Amnesteem?

- Store at 20° to 25°C (68° to 77°F). [See USP Controlled Room Temperature.] Protect from light.
- **Keep Amnesteem and all medicines out of the reach of children.**

General Information about Amnesteem

Medicines are sometimes prescribed for conditions that are not mentioned in Medication Guides. Do not use Amnesteem for a condition for which it was not prescribed. Do not give Amnesteem to other people, even if they have the same symptoms that you have. It may harm them.

This Medication Guide summarizes the most important information about Amnesteem. If you would like more information, talk with your doctor. You can ask your doctor or pharmacist for information about Amnesteem that is written for healthcare professionals. You can also call iPLEDGE program at 1-866-495-0654 or visit www.ipledgeprogram.com.

What are the ingredients in Amnesteem?

Active Ingredient: Isotretinoin

Inactive Ingredients: butylated hydroxyanisole, edetate disodium, hydrogenated vegetable oil, soybean oil and yellow wax. Gelatin capsules contain glycerin, with the following dye systems: 10 mg – black ink and red iron oxide paste; 20 mg – black ink, red iron oxide paste, titanium dioxide and yellow iron oxide paste; 40 mg – black ink, red iron oxide paste, titanium dioxide and yellow iron oxide paste.

This Medication Guide has been approved by the U.S. Food and Drug Administration.

Dilantin is a registered trademark of Warner-Lambert Company LLC.

Manufactured by:
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 67930 Beinheim
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Packaged by:
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 Philadelphia, PA 19114 U.S.A.



MYLAN®

Distributed by:
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CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 075945/S-014

LABELING REVIEW

**Labeling Review Branch
Division of Labeling and Program Support
Office of Generic Drugs**

Labeling Supplement Review

Application Number: 75-945/S-014

Name of Drug: Amnesteem® (Isotretinoin Capsules USP), 10 mg, 20 mg, and 40 mg.

Applicant: Mylan Pharmaceuticals, Inc.

Material Reviewed:

Submission Date: March 4, 2010

Background and Summary

Model labeling: Accutane Capsules (NDA 18-662/S-060: Approved February 01, 2010)
This supplemental new drug application provides for revisions to question 12 of the *Patient Information/Informed Consent About Birth Defects*. It also provides for changes to the to the “WARNINGS” section to include new information regarding serious skin reactions.

Review

REVISIONS: Same as the reference listed drug, Accutane Capsules: Approved February 01, 2010.

Package insert/Medication Guide – See attached pages for revisions

Recommendation

Labeling: Satisfactory as submitted electronically **March 4, 2010**

Approve labeling supplement.

{ see appended electronic signature }

Beverly Weitzman
Labeling Reviewer

Supervisory Comment/Concurrence:

{ see appended electronic signature }

John Grace
Team Leader

Application Type/Number	Submission Type/Number	Submitter Name	Product Name
----- ANDA-75945	----- SUPPL-14	----- GENPHARM INC	----- ISOTRETINOIN

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

/s/

BEVERLY WEITZMAN
03/23/2010

JOHN F GRACE
03/25/2010

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 075945/S-014

ADMINISTRATIVE and CORRESPONDENCE
DOCUMENTS



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March 4, 2010

**SPECIAL SUPPLEMENT - CHANGES BEING EFFECTED
(LABELING INFORMATION PROVIDED)**

Office of Generic Drugs, CDER, FDA
Gary Buehler, Director
Document Control Room
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

RE: Amnesteem[®] (Isotretinoin Capsules, USP) 10 mg, 20 mg and 40 mg
ANDA 075945
(Labeling Revisions Pursuant to the CDER Internet Posting Dated
February 1, 2010)

Dear Mr. Buehler:

We wish to supplement the above referenced Abbreviated New Drug Application (ANDA) with a revised final printed outsert (ISOT:R1/MG:ISOT:R1, February 2010) pursuant to CDER Internet Posting dated February 1, 2010 (NDA 018662/S-060) which contained labeling revisions for the innovator product, ACCUTANE[®] (Hoffmann-La Roche Inc.). A copy of the CDER Internet Posting letter dated February 1, 2010 is provided in Section 1.4.4 for the reviewer's reference. A copy of the Innovator's labeling approved on February 1, 2010 is included in Section 1.14.3.2. Editorial revisions have also been made to the final printed outsert to be consistent with Mylan's current standard format. A side-by-side comparison of Mylan's proposed final printed final printed outsert to the currently approved outsert is provided in Section 1.14.1.2.

In accordance with the Agency's Guidance *Providing Regulatory Submissions in Electronic Format – Content of Labeling* (April 2005), Structured Product Labeling (SPL) for Amnesteem (Isotretinoin Capsules USP, 10 mg, 20 mg and 40 mg) is provided in Section 1.14.2.3. As a review aid, Microsoft Word versions have also been provided for the proposed labeling components.

The revised outsert will be issued for production use in approximately 30 days from the date of this supplement.

Gary J. Buehler
Page 2 of 2

This supplement is being submitted through the FDA's Electronic Submissions Gateway. Please note that Mylan submitted a letter of Non-Repudiation on April 17, 2006. Should you have any questions regarding this supplement, please contact the undersigned by telephone at (304) 599-2595, ext. 6551, via facsimile at (304) 285-6407 or email at wayne.talton@mylanlabs.com.

Sincerely,



S. Wayne Talton
Vice President
Regulatory Affairs

SWT/bk