Risk Evaluation and Mitigation Strategy (REMS) Document

Mycophenolate Shared System REMS

I. Administrative Information

Risk: embryo-fetal toxicity
Initial Shared System REMS Approval: [09/2012]
Most Recent REMS Updated: [08/2024]

II. REMS Goal

The goal of the Mycophenolate REMS is to mitigate the risk of embryo-fetal toxicity associated with use of mycophenolate during pregnancy.

Objectives:

1. Educating healthcare providers on the increased risks of first trimester pregnancy loss and congenital malformations associated with exposure to mycophenolate during pregnancy
2. Educating healthcare providers on the need to counsel females of reproductive potential on the importance of pregnancy prevention and planning when taking mycophenolate
3. Educating healthcare providers on the need to report pregnancies to the Mycophenolate Pregnancy Registry
4. Informing females of reproductive potential who are prescribed mycophenolate about the increased risks of pregnancy loss (miscarriage) and birth defects
5. Informing females of reproductive potential who are prescribed mycophenolate about the importance of pregnancy prevention and planning when taking mycophenolate

III. REMS Requirements

Mycophenolate Applicants must provide training to healthcare providers who prescribe mycophenolate.

The training must include all the elements of the FDA Blueprint.

For training provide by Mycophenolate Applicants, the training includes the following educational material: Healthcare Provider Brochure.

For training provided by Continuing Education (CE) Providers, training is compliant with the REMS if it:

1. is offered by an accredited CE Provider and supported by independent commercially-supported educational grants from the Mycophenolate Applicants;
2. includes, at a minimum, a knowledge assessment of all sections of the FDA Blueprint; and
3. is subject to independent audit to confirm that conditions of the REMS training have been met.

To inform healthcare providers about the REMS and the risks and safe use of mycophenolate, Mycophenolate Applicants must disseminate REMS communication materials according to the table below:

Target Audience	Communication Materials & Dissemination Plans
Healthcare providers who prescribed mycophenolate at least once in the 12 months prior to the date of the REMS modification approval	REMS Letter: Dear Healthcare Provider Letter 1 1. Email within 60 calendar days of the approval of the REMS modification (01/15/2021). If a healthcare provider's email address is not available, send by mail. a. For first emails marked unopened: Send a second email within seven (7) calendar days of the date the first email was sent. b. For second emails marked unopen: Send by mail within 30 calendar days of the date that the second email was sent. c. For emails that are undeliverable: Send by mail within 30 calendar days of the date that the first set of emails were sent. REMS Letter: Dear Healthcare Provider Letter 2 2. Email when accredited continuing education is available and no later than 12 months following REMS modification approval. If a healthcare provider's email address is not available, send by mail. a. For first emails marked unopened: Send a second email within seven (7) calendar days of the date the first email was sent. b. For second emails marked unopen: Send by mail within 30 calendar days of the date that the second email was sent. c. For emails that are undeliverable: Send by mail within 30 calendar days of the date that the first set of emails were sent.
All transplant centers	REMS Letter: Dear Healthcare Provider Letter for Centers 1 1. Mail within 60 calendar days of the approval of the REMS modification (01/15/2021). REMS Letter: Dear Healthcare Provider Letter for Centers 2 2. Mail when accredited continuing education is available and no later than 12 months following REMS modification approval (01/15/2021).
All newly identified healthcare providers who prescribed mycophenolate at least once in the prior 12 months	REMS Letter: Dear Healthcare Provider Letter 1 1. Email within 60 calendar days of the date the healthcare provider is newly identified from the approval of the REMS modification until accredited continuing education is available. a. Send a second email within seven (7) calendar days of the date the first email was sent if the first email is marked as unopened. b. Send by mail within 30 calendar days of the date that the second email was sent if the second email is marked as unopened. c. Send by mail within 30 calendar days of the date that the first set of emails were sent if a healthcare provider's email address is not available or the email is undeliverable. REMS Letter: Dear Healthcare Provider Letter 2 2. After accredited continuing education is available: email within 60 calendar days of the date the healthcare provider is newly identified. a. Send a second email within seven (7) calendar days of the date the first email was sent if the first email is marked as unopened. b. Send by mail within 30 calendar days of the date that the second email was sent if the second email is marked as unopened. c. Send by mail within 30 calendar days of the date that the first set of emails were sent if a healthcare provider's email address is not available or the email is undeliverable.
Healthcare providers who are likely to prescribe mycophenolate	Website Banner 1. Publish quarterly for 30 calendar days for the first 12 months after approval of the REMS modification, then every 6 months for 2 years through the following professional societies and their associated journals: a. American College of Rheumatology b. American Society of Transplantation c. American College of Physicians d. American Academy of Neurology e. American College of Obstetricians and Gynecologists f. American Society of Nephrology

To support REMS operations, Mycophenolate Applicants must:

1. Establish and maintain a REMS website, www.mycophenolaterems.com. The REMS website must include a current list of training funded by the Mycophenolate Applicants the capability for healthcare providers to confirm that they have completed training, order patient education materials, and to print the Prescribing Information, Medication Guide, and REMS materials. All product websites for consumers and healthcare providers must include prominent REMS-specific links to the REMS website. The REMS website must not link back to the promotional product websites.
2. Make the REMS website fully operational and all REMS materials available through the website and call center within 60 calendar days of REMS modification approval on 01/15/2021.
3. Establish and maintain a REMS call center for healthcare providers at 1-800-617-8191.
4. Direct CE Providers to the FDA Blueprint on https://www.accessdata.fda.gov/drugsatfda_docs/rems/Mycophenolate_2024_04_08_Mycophenolate_REMS_Education_Blueprint_for_Healthcare_Providers_Who_Prescribe_FDA%20Blueprint.pdf
5. Ensure healthcare providers are able to order the Patient Information Brochure: What You Need to Know About Mycophenolate and Mycophenolate Pregnancy Registry Frequently Asked Questions for Patients online and by phone.
6. Ensure healthcare providers are able to access training no later than 12 months following approval of the REMS modification (01/15/2021).
7. Ensure healthcare providers are able to report completion of training online and by mail, email, and fax using the Prescriber Training Confirmation Form.
8. Ensure designees of transplant centers are able to report that healthcare providers at the center have completed training by mail, email, and fax using the Center Training Confirmation Form.
9. Establish and maintain a validated, secure database of all healthcare providers and centers that report completing training.
10. Monitor distribution and prescription data monthly to identify new mycophenolate prescribers who need to be trained.
11. Notify accredited CE Providers of REMS-compliant training regarding changes to the FDA Blueprint within 10 calendar days of such changes.
12. Use independent auditors (accreditation bodies of CE Providers are considered independent and eligible to conduct the audits) to audit the educational materials used by the accredited CE Providers of REMS-compliant training funded by the Mycophenolate Applicants to evaluate:
    a. whether the content of the training addresses all the elements of the FDA Blueprint,
    b. whether the knowledge assessment measures knowledge of all sections of the FDA Blueprint,
    c. whether the training was conducted in accordance with the standards for commercially-supported CE of the Accreditation Council for Continuing Medical Education or of another CE accrediting body appropriate to prescribers.
13. Establish and maintain a registry which includes a reporting and collection system for females who become pregnant and consent to participate to provide information on maternal and fetal outcomes.
14. Ensure that once a report suggestive of pregnancy is received, a Mycophenolate Applicant follows up with the healthcare provider to obtain all required data for the registry.

IV. REMS Assessment Timetable

Mycophenolate NDA Applicants must submit REMS Assessment s 18 months from the date of the REMS modification approval and every 18 months thereafter. To facilitate inclusion of as much information as possible while allowing reasonable time to prepare the submission, the reporting interval covered by each assessment should conclude no earlier than 60 calendar days before the submission date for that assessment. The Mycophenolate NDA Applicants must submit each assessment so that it will be received by the FDA on or before the due date.

V. REMS Materials

The following materials are part of the Mycophenolate REMS:

Training and Educational Materials

Healthcare Provider:

1. Healthcare Provider training available at www.mycophenolaterems.com
2. Healthcare Provider Brochure

Patient:

3. Patient Information Brochure: What You Need to Know About Mycophenolate
4. Mycophenolate Pregnancy Registry Frequently Asked Questions for Patients

Communication Materials

5. Dear Healthcare Provider Letter 1
6. Dear Healthcare Provider Letter 2
7. Dear Healthcare Provider Letter for Centers 1
8. Dear Healthcare Provider Letter for Centers 2
9. Website Banner

Other Materials

10. Program website (www.mycophenolaterems.com)
11. Mycophenolate REMS Education Blueprint for Healthcare Providers Who Prescribe (FDA Blueprint)
12. Prescriber Training Confirmation Form
13. Center Training Confirmation Form