

Sodium Oxybate REMS Program

Certified Pharmacy Training Modules A and B

All Sodium Oxybate REMS Program Certified Pharmacy staff and pharmacists must complete **Module A** and the Module A Knowledge Assessment. Pharmacists must also complete **Module B** and the Module B Knowledge Assessment.

Dear Sodium Oxybate REMS Program Certified Pharmacy Staff,

Welcome to the Sodium Oxybate REMS Program, which has been approved by the Food and Drug Administration (FDA) as a Risk Evaluation and Mitigation Strategy (REMS).

The Sodium Oxybate REMS Program

The FDA has determined that a REMS is necessary to ensure that the benefits of sodium oxybate oral solution outweigh the risks of serious adverse outcomes resulting from inappropriate prescribing, misuse, abuse, and diversion of sodium oxybate by:

1. Informing prescribers, pharmacists, and patients of:
 - The risk of significant central nervous system (CNS) and respiratory depression associated with sodium oxybate
 - The contraindication of use of sodium oxybate with sedative hypnotics and alcohol
 - The potential for abuse, misuse, and overdose associated with sodium oxybate
 - The safe use, handling, and storage of sodium oxybate

2. Ensuring that pharmacy controls exist prior to filling prescriptions for sodium oxybate that:
 - Screen for concomitant use of sedative hypnotics and other potential interacting agents
 - Monitor for inappropriate prescribing, misuse, abuse, and diversion of sodium oxybate
 - Notify prescribers when patients are receiving concomitant contraindicated medications or when there are signs of potential abuse, misuse, or diversion.

This training provides information about the Sodium Oxybate REMS Program that includes important information about sodium oxybate and the responsibilities of certified pharmacy staff involved in the dispensing of sodium oxybate.

Sodium oxybate is approved for:

- Treatment of cataplexy in narcolepsy
- Treatment of excessive daytime sleepiness (EDS) in narcolepsy

Sodium oxybate may be prescribed only by prescribers certified in the Sodium Oxybate REMS Program and dispensed only to patients enrolled in the Sodium Oxybate REMS Program and dispensed by pharmacies certified in the Sodium Oxybate REMS Program.

Sincerely,

Sodium Oxybate sponsors

Table of Contents

MODULE A: SODIUM OXYBATE REMS PROGRAM	5
Indications and Usage.....	5
How Supplied	5
Controlled Substance Scheduling.....	5
Boxed Warning.....	6
Contraindications	6
Warnings and Precautions.....	6
Sodium Oxybate REMS Program Requirements.....	7
Overview of Certified Pharmacy Responsibilities	7
Prescription Processing	8
Shipping	9
Monitoring for Inappropriate Prescribing, Abuse, Misuse, and Diversion.....	9
MODULE B: SODIUM OXYBATE REMS PROGRAM TRAINING FOR PHARMACISTS	12
Sodium Oxybate REMS Program Requirements.....	12
Certified Pharmacy Responsibilities	12
Patient Counseling and Screening.....	13
Clinical Usage Clarifications	14
Prescription Refills	14
Monitoring and Assessing for Signs of Abuse, Misuse, and Diversion.....	15
Shipping Procedures.....	15
Inventory Control.....	16

Sodium Oxybate REMS Program

Certified Pharmacy Training Module A

Training for Pharmacy Staff Involved in the Sodium Oxybate REMS Program

All pharmacy staff within a Sodium Oxybate REMS Program certified pharmacy must complete training on **Module A** and successfully complete the Module A Knowledge Assessment. Training must be completed annually.

MODULE A: SODIUM OXYBATE REMS PROGRAM

Important Safety Information

Indications and Usage

Sodium oxybate oral solution is a central nervous system (CNS) depressant that is indicated for the following:

- Treatment of cataplexy in narcolepsy
- Treatment of excessive daytime sleepiness (EDS) in narcolepsy

Sodium oxybate may be prescribed only by prescribers certified in the Sodium Oxybate REMS Program and dispensed only to patients enrolled in the Sodium Oxybate REMS Program.

How Supplied

Sodium oxybate is shipped from a Sodium Oxybate REMS Program certified pharmacy directly to patients. Each shipment to a patient will contain:

- The prescribed amount of medication, contained in one or more bottles of sodium oxybate
- A press-in-bottle adaptor (PIBA) inserted into the bottle at the certified pharmacies
- A sodium oxybate-specific grams-based oral measuring device (plastic syringe) to measure out each nightly dose
- Two empty pharmacy vials with child-resistant caps for preparation of both nightly doses (sodium oxybate dose mixed with water)
- A sodium oxybate Medication Guide

Controlled Substance Scheduling

The active ingredient in sodium oxybate is sodium oxybate or gamma-hydroxybutyrate (GHB, a known drug of abuse). GHB has been used to facilitate sexual assaults. Because of its rapid sedative effects (particularly when mixed with alcohol) and its colorless and odorless appearance, GHB has been used to "spike" the drinks of unsuspecting victims. Because of its abuse potential, GHB is designated a controlled substance by the Drug Enforcement Administration (DEA) and has been placed in a bifurcated federal schedule:

- GHB products approved by the FDA, such as sodium oxybate, and used as prescribed for therapeutic purposes are Schedule III drugs

The active ingredient of sodium oxybate is classified as a Schedule I controlled substance when used for any other reason or by anyone other than for whom it was prescribed. Federal law prohibits the transfer of sodium oxybate to any persons other than the patient for whom it was prescribed.

Boxed Warning

WARNING: CENTRAL NERVOUS SYSTEM DEPRESSION and MISUSE AND ABUSE

Sodium oxybate is a CNS depressant. In clinical trials at recommended doses obtundation and clinically significant respiratory depression occurred in sodium oxybate-treated patients. Almost all of the patients who received sodium oxybate during clinical trials in narcolepsy were receiving central nervous system stimulants.

Sodium oxybate is the sodium salt of gamma hydroxybutyrate (GHB). Abuse of GHB, either alone or in combination with other CNS depressants, is associated with CNS adverse reactions, including seizure, respiratory depression, decreases in the level of consciousness, coma, and death.

Because of the risks of CNS depression, abuse and misuse, sodium oxybate is available only through a restricted distribution program called the Sodium Oxybate REMS Program, using certified pharmacies. Prescribers must certify and patients must enroll in the Sodium Oxybate REMS Program. For further information go to www.SodiumOxybateREMSProgram.com or call 855-705-2424.

Contraindications

- Sodium oxybate is contraindicated in:
 - Patients who take sedative hypnotic agents.
 - Patients who drink alcohol while using sodium oxybate.
 - Patients with succinic semi aldehyde dehydrogenase deficiency, a rare disorder of inborn error of metabolism variably characterized by mental retardation, hypotonia, and ataxia.

Warnings and Precautions

CNS Depression

- Sodium oxybate is a CNS depressant.
- Concurrent use of sodium oxybate with other CNS depressants, including but not limited to opioid analgesics, benzodiazepines, sedating antidepressants or antipsychotics, sedating anti-epileptic drugs, general anesthetics, muscle relaxants, and/or illicit CNS depressants, may increase the risk of respiratory depression, hypotension, profound sedation, syncope, and death.
 - If use of these CNS depressants in combination with sodium oxybate is required, dose reduction or discontinuation of one or more CNS depressants (including sodium oxybate) should be considered.
 - If short-term use of an opioid (e.g., post- or perioperative) is required, interruption of treatment with sodium oxybate should be considered.
- Patients who have sleep apnea or compromised respiratory function may be at a higher risk of developing respiratory depression, loss of consciousness, coma, and death with sodium oxybate use.
- Healthcare providers should caution patients about operating hazardous machinery for the first 6 hours after taking a dose of sodium oxybate.

Abuse, Misuse, and Diversion

- Sodium oxybate or GHB, is a Schedule I controlled substance. Abuse of illicit GHB, either alone or in combination with other CNS depressants, is associated with CNS adverse events, including seizure, respiratory depression, decreases in the level of consciousness, coma, and death.
- The rapid onset of sedation, coupled with the amnesic features of sodium oxybate, particularly when combined with alcohol, has proven to be dangerous for the voluntary and involuntary user (e.g. assault victim).
- Patients should be carefully evaluated for a history of substance abuse. Patients with a history of drug abuse should be closely monitored for signs of misuse or abuse of GHB (e.g. increase in dose or frequency of dosing, drug-seeking behavior, feigned cataplexy).

For complete safety information, please see the Prescribing Information for sodium oxybate.

Sodium Oxybate REMS Program Requirements

Sodium oxybate may be prescribed only by prescribers certified in the Sodium Oxybate REMS Program and dispensed only to patients enrolled in the Sodium Oxybate REMS Program. Because of the risks of central nervous system depression, abuse, misuse, and diversion, sodium oxybate is available only through a restricted distribution program called the Sodium Oxybate REMS Program.

Required components of this program include:

- Use of a certified pharmacy.
- Healthcare Providers who prescribe sodium oxybate must have completed the *Sodium Oxybate REMS Program Prescriber Enrollment Form* and must comply with the requirements of the Sodium Oxybate REMS Program.
- To receive sodium oxybate, patients must be enrolled in the Sodium Oxybate REMS Program and be counseled on the serious risks and safe use of sodium oxybate treatment. Patients are enrolled by certified prescribers who must fill out and submit the *Sodium Oxybate REMS Program Patient Enrollment Form*. Prescribers must also complete and submit the *Sodium Oxybate REMS Program Prescription Form* to one of the certified pharmacies for all new sodium oxybate prescriptions and for sodium oxybate prescriptions for patients restarting sodium oxybate treatment after not receiving sodium oxybate for 6 months or more.
- Further information is available at www.SodiumOxybateREMSProgram.com.

Overview of Certified Pharmacy Responsibilities

Enrollment Verification

- The *Sodium Oxybate REMS Program Prescriber Enrollment Form* and the *Sodium Oxybate REMS Program Patient Enrollment Form* are sent to the Sodium Oxybate REMS Program by the prescriber.
- Information from the enrollment forms is maintained in the appropriate Sodium Oxybate REMS Program database by the Sodium Oxybate REMS Program.
- No duplicate patients may be enrolled.
- Patients must confirm that they have been counseled on the serious risks and safe use of sodium oxybate; their certified pharmacy will provide counseling with every sodium oxybate prescription dispensed.
- The Sodium Oxybate REMS Program will notify the prescriber of successful certification in the Sodium Oxybate REMS Program, and that he or she is eligible to prescribe sodium oxybate.
 - If there is a delay in shipping while a question about the prescriber's credentials is being resolved, the patient will be notified by their certified pharmacy.
 - If the prescription cannot be filled because a question about the prescriber's credentials could not be resolved, the patient will be notified by their certified pharmacy.
 - The prescriber will be notified by the Sodium Oxybate REMS Program that he/she cannot be certified due to credential verification failure.
- The Sodium Oxybate REMS Program will notify the prescriber of successful patient enrollment in the Sodium Oxybate REMS Program.
- Enrollment status is maintained in the Sodium Oxybate REMS Program.
 - The Sodium Oxybate REMS Program will confirm that the prescriber's DEA and state license numbers are active and that the prescriber has provided all REMS-required attestations.
 - A prescriber may be disenrolled from the program for expired DEA or state licensures or for non-compliance with the Sodium Oxybate REMS Program.
 - Following enrollment, the patient remains in the Sodium Oxybate REMS Program unless their certified pharmacy, and/or certified prescriber determine that the patient should be disenrolled.
- A certified prescriber and/or a certified pharmacy can direct that a patient be disenrolled from the Sodium Oxybate REMS Program.
 - A patient may be disenrolled from the program for non-compliance with the Sodium Oxybate REMS Program, including for multiple suspicious early refill requests, or other information that indicates abuse, misuse, or diversion.
 - The Sodium Oxybate REMS Program will contact a prescriber if an enrollment form is received for a patient previously disenrolled from the program, or for suspicions of abuse, misuse, or diversion, and will provide the prescriber with all relevant patient history.

Prescription Processing

- A certified pharmacy must validate all prescriptions prior to dispensing sodium oxybate. This includes obtaining a Pre-Dispense Authorization (PDA) from the Sodium Oxybate REMS Program for each prescription upon receipt of a *Sodium Oxybate REMS Program Prescription Form*. The issuance of PDA informs the pharmacy that the prescriber is certified and patient is enrolled in the Sodium Oxybate REMS Program and the patient has no other active sodium oxybate prescriptions.
 - The certified pharmacy will process all sodium oxybate prescriptions, including cash payments, through the pharmacy management system (PMS) and obtain a PDA via electronic telecommunication verification to verify the prescriber is certified, the patient is enrolled in the Sodium Oxybate REMS Program and the patient has no other active sodium oxybate prescriptions.
 - To verify the safe use conditions electronically through the PMS, the following prescription information, at a minimum, is required to be submitted upon processing every sodium oxybate prescriptions:
 - Patient First Name
 - Patient Last Name
 - Patient Date of Birth
 - Patient Zip Code
 - Prescriber Identifier on prescription (NPI or DEA)
 - Date of Fill
 - Days' Supply
 - Quantity
 - Product/NDC
 - If all safe use conditions are met, a PDA will be generated by the Sodium Oxybate REMS Program. The PDA will be maintained in the Sodium Oxybate REMS Program patient database, and does not need to be recorded by the pharmacy. The pharmacy is authorized to dispense sodium oxybate upon receiving a PDA.
 - If the safe use conditions are not met, a PDA will not be issued and the pharmacy will be notified of the reason why:
 - Pharmacy is not certified
 - Prescriber is not certified
 - Patient is not enrolled
 - Patient has a known active, overlapping prescription for sodium oxybate
- Before ordering sodium oxybate from your distributor/wholesaler, you must obtain a PDA from the Sodium Oxybate REMS Program. Distributors/wholesalers are required to verify with the Sodium Oxybate REMS Program that you have a PDA before sending sodium oxybate to your pharmacy. Each bottle of Sodium Oxybate is to be ordered on a per-patient basis only.
- Before a prescription for sodium oxybate can be shipped to a patient, the pharmacy must:
 - Verify that the *Sodium Oxybate REMS Program Prescription Form* is complete and signed by the prescriber.
 - Verify the *Sodium Oxybate REMS Program Prescription Form* was received from the prescriber's office.
 - Verify the prescription is dated according to state controlled prescription regulations.
 - Verify the prescription is for only a one-month supply on a patient's first sodium oxybate fill and no more than a 3-month supply on subsequent fills.
 - Verify there are no discrepancies or concerns with the dosing and titration.
 - If there are discrepancies or concerns, the certified pharmacy must contact the prescriber to revise and resubmit the *Sodium Oxybate REMS Program Prescription Form*.
 - Review the patient information contained in the Sodium Oxybate REMS Program patient database using the secure web viewing portal and the *Sodium Oxybate REMS Program Prescription Form* including:
 - Concomitant use of sedative hypnotics, other CNS depressants, or other potentially interacting agents that either are unknown to the prescriber or pose a high risk of serious interaction with sodium oxybate.
 - If patient use of a contraindicated medication or other potentially interacting agent is confirmed and if the prescriber has not indicated prior knowledge, then the pharmacist will notify and consult the prescriber about the risks of concomitant medication use and document the call and the prescriber's treatment rationale on the *Sodium Oxybate Patient Counseling Checklist*.
 - Alerts and Sodium Oxybate REMS Program RMRs regarding potential abuse, misuse, or diversion.
 - Contact the Xyrem REMS Program by phone to:
 - Verify that the patient has no other active prescriptions for sodium oxybate that overlap with the current prescription.
 - Verify that the patient/prescriber has not been disenrolled in the Xyrem REMS Program for suspected abuse, misuse, or diversion.
 - Report all prescriptions filled for sodium oxybate.
 - Document that the call to the Xyrem REMS Program was completed using the *Sodium Oxybate REMS Program Prescription Form*.
- If a certified pharmacy receives overlapping prescriptions for sodium oxybate for a patient, the certified pharmacy responsible for dispensing the current prescription will notify and consult each prescriber.

- Prescriptions are considered overlapping when more than one prescription for sodium oxybate is received for a patient from multiple prescribers within an overlapping timeframe.
 - If a certified pharmacy suspects abuse, misuse, or diversion, the prescription should not be filled, the certified pharmacy must complete and submit a *Sodium Oxybate REMS Program RMR* to the Sodium Oxybate REMS Program, and the prescriber will be notified.
 - There are valid reasons why a patient may have overlapping prescriptions, including if the patient moves or changes prescribers, or if the prescriber sends in a new prescription prior to the completion of all refills.
 - A certified pharmacy responsible for dispensing sodium oxybate to a patient must ensure that under these situations a patient does not receive multiple overlapping shipments of sodium oxybate.
- Once a PDA is obtained from the Sodium Oxybate REMS Program, review of the patient information in the patient database using the secure web viewing portal has been performed, and the Xyrem REMS Program has been contacted, the certified pharmacy will contact the patient to schedule shipment and complete the required counseling.
 - For a new patient, the certified pharmacy provides the *Sodium Oxybate REMS Program Patient Quick Start Guide*.
 - A pharmacist must counsel the patient by completing the *Sodium Oxybate REMS Program Patient Counseling Checklist* prior to every dispense of sodium oxybate.
 - The certified pharmacy must submit the *Sodium Oxybate REMS Program Patient Counseling Checklist* to the Sodium Oxybate REMS Program online at www.SodiumOxybateREMSProgram.com or complete a print version and fax to the Sodium Oxybate REMS Program at 800-353-0987.

Shipping

All sodium oxybate is shipped to patients (or their adult designee) by an overnight service with receipt signature required. Certified pharmacies must provide confirmation of receipt of each prescription of sodium oxybate to the Sodium Oxybate REMS Program by accessing the Sodium Oxybate REMS Program website (www.SodiumOxybateREMSProgram.com), or calling the Sodium Oxybate REMS Program (855-705-2424).

- The patient may request an alternate shipping address, which is subject to approval by a pharmacist.
- See [How Supplied](#) for details of the contents of each sodium oxybate shipment.
- Daily tracking reports are generated to confirm the receipt of each order shipped.
- Lost shipments are investigated.

Monitoring for Inappropriate Prescribing, Abuse, Misuse, and Diversion

Certified pharmacies must conduct detailed monitoring on an ongoing basis of patients and prescribers for signs of inappropriate prescribing, abuse, misuse and diversion. Each certified pharmacy will:

- Document early refill requests and instances of patient and prescriber behavior that suggest potential abuse, misuse, or diversion by completing and submitting a *Sodium Oxybate REMS Program RMR* to the Sodium Oxybate REMS Program online at www.SodiumOxybateREMSProgram.com or complete a print version and fax to the Sodium Oxybate REMS Program at 800-353-0987. This information is maintained in the prescriber and/or patient databases in the Sodium Oxybate REMS Program.
 - Direct the Sodium Oxybate REMS Program to disenroll a patient that has demonstrated behavior that suggests potential abuse, misuse, or diversion by completing and submitting a *Sodium Oxybate REMS Program RMR* to the Sodium Oxybate REMS Program. The Sodium Oxybate REMS Program will notify the Xyrem REMS Program that the patient has been disenrolled.
 - Recommend that a prescriber who has demonstrated behavior that suggests potential abuse, misuse, or diversion be disenrolled by submitting a *Sodium Oxybate REMS Program RMR* to the Sodium Oxybate REMS Program. The Sodium Oxybate REMS Program will notify the Xyrem REMS Program that the prescriber has been disenrolled if disenrollment is determined to be the appropriate corrective action.
- Review the patient's Sodium Oxybate REMS Program RMR history and alerts in the Sodium Oxybate REMS Program using the secure pharmacy web viewing portal for the patient database prior to granting an early refill request or if abuse, misuse, or diversion is suspected.
- Discuss early refill requests or other patient incidents with the prescriber so that the prescriber can make a decision to allow or deny the early refill, or to take some other action based on the patient's behavior and history.
- Report all Sodium Oxybate REMS Program RMRs to the Sodium Oxybate REMS Program by completing and submitting the *Sodium Oxybate REMS Program RMR*.
- Determine whether an alert should be placed in the patient's profile in the patient database within the Sodium Oxybate REMS Program for repeated reports of lost, stolen, destroyed, or spilled drug for review prior to shipping sodium oxybate.
- Inform a pharmacist immediately if certified pharmacy staff suspects patients or prescribers of abuse, misuse, or diversion.

Adverse Event Reporting

- Everyone on staff in each certified pharmacy has an essential role to play in the process of collecting information on potential adverse events for reporting to the Sodium Oxybate REMS Program.

- Report all potential adverse events reported by all sources, including any CNS depression, respiratory depression, loss of consciousness, coma, and death, and any cases of suspected abuse, misuse, or diversion by calling the Sodium Oxybate REMS Program at 855-705-2424.
- Report all potential adverse events related to suspected abuse, misuse, or diversion, by completing and submitting the *Sodium Oxybate REMS Program RMR* to the Sodium Oxybate REMS Program online at www.SodiumOxybateREMSProgram.com or by fax to 800-353-0987.

Ongoing Patient Education

Patients in the Sodium Oxybate REMS Program have access to ongoing education while taking sodium oxybate through:

- 24-hour toll-free telephone help line staffed by a pharmacist trained in the Sodium Oxybate REMS Program.
- Continued contact with the certified pharmacy for every refill.
- Sodium Oxybate REMS Program website (www.SodiumOxybateREMSProgram.com).

Sodium Oxybate REMS Program

Certified Pharmacy Training Module B

Sodium Oxybate REMS Program Training for Pharmacists Involved in the Dispensing of Sodium Oxybate

All Sodium Oxybate REMS Program certified pharmacy pharmacists must complete training on Module B (in addition to Module A) and successfully complete the associated Knowledge Assessment. For all pharmacists who dispense sodium oxybate, training must be completed annually.

MODULE B: SODIUM OXYBATE REMS PROGRAM TRAINING FOR PHARMACISTS

All pharmacists involved in dispensing sodium oxybate must complete the following additional training at least annually. The Sodium Oxybate REMS Program requires that pharmacists within a certified pharmacy are thoroughly trained on the requirements of the Sodium Oxybate REMS Program. Training will be conducted by reviewing the Sodium Oxybate REMS Program materials and successfully completing a Knowledge Assessment with 100% accuracy on the requirements of certified pharmacies and pharmacists working within a certified pharmacy. These duties will include:

- Review of PI
- Review of certified pharmacy's internal processes and procedures established to support the Sodium Oxybate REMS Program with an experienced pharmacist
- Execution of the Sodium Oxybate REMS Program Patient Counseling Checklist
- Detailed monitoring including completion of a *Sodium Oxybate REMS Program RMR*, as needed
- Follow-up interactions with patients and prescribers
- Sodium Oxybate REMS Program documentation and processes

Sodium Oxybate REMS Program Requirements

Sodium oxybate may be prescribed and dispensed only to patients enrolled in the Sodium Oxybate REMS Program. Because of the risks of CNS depression, abuse, misuse, and diversion, sodium oxybate is available only through a restricted distribution program called the Sodium Oxybate REMS Program.

Required components of this program include:

- Use of a certified pharmacy.
- Healthcare providers who prescribe sodium oxybate must complete and submit the following to the Sodium Oxybate REMS Program:
 - *The Sodium Oxybate REMS Program Prescriber Enrollment Form*
 - *The Sodium Oxybate REMS Program Patient Enrollment Form*
- Healthcare providers who prescribe sodium oxybate must complete prescriptions for sodium oxybate on the *Sodium Oxybate REMS Program Prescription Form* and submit the completed form to one of the certified pharmacies.
 - After completion of prescription processing, the pharmacy will fax the prescription form to the Sodium Oxybate REMS Program and retain the original.
 - Prescription refills and renewals may be conveyed by phone or fax and must be documented in the Sodium Oxybate REMS Program.
- To receive sodium oxybate, patients must be:
 - Enrolled in the Sodium Oxybate REMS Program.
 - Prescribed sodium oxybate by a prescriber certified in the Sodium Oxybate REMS Program.
 - Counseled on the serious risks and safe use of sodium oxybate.
 - Have only one active sodium oxybate prescription.

Certified Pharmacy Responsibilities

Certified pharmacies will:

- Limit the first prescription fill to a one-month supply of sodium oxybate and no more than a 3-month supply for subsequent prescription fills.
- Report potential adverse events to the Sodium Oxybate REMS Program.
- Notify prescribers when there are signs of potential abuse or misuse or when patients are taking sedative hypnotics, other CNS depressants, or other potentially interacting agents of which the prescriber is not already aware.
- Certified pharmacies must complete and submit a *Sodium Oxybate REMS Program RMR* to the Sodium Oxybate REMS Program for all instances of potential abuse, misuse, or diversion.
- Utilize the Sodium Oxybate REMS Program, which has access to the secure, validated, separate and distinct Sodium Oxybate REMS Program databases (patient database, certified prescriber database, certified pharmacy database, and disenrolled prescriber database) that will only be queried independently through electronic verification, to verify the following:
 - Complete patient enrollment information
 - Complete prescriber certification information
 - Patient information including:
 - Name and two additional identifiers (date of birth, phone number, address, gender)
 - Current and previous prescribers
 - Comorbid conditions and concomitant medications reported by the patient

- Prescription history
- Prescription information including:
 - Date
 - Dose
 - Titration instructions
 - Number of refills
 - Directions
 - Total quantity (volume and number of days' supply)
 - Concomitant medications
- Sodium Oxybate REMS Program Risk Management Reports (RMRs)
- Shipment information, including:
 - Dates of shipments
 - Dates of shipment receipts
 - Patient addresses
 - Designee information
 - Number of shipments sent daily
 - Quantity of sodium oxybate dispensed daily
- Documentation of interactions with prescribers, patients, and other parties.

These data must be available to the Sodium Oxybate REMS Program for review on an ongoing basis to ensure that sodium oxybate is dispensed to enrolled patients only after completion and documentation of safe use conditions. In certain cases, a pharmacist must access a patient's or prescriber's historical data in the Sodium Oxybate REMS Program using the certified pharmacy secure web viewing portal for the patient database and review it prior to dispensing sodium oxybate.

Patient Counseling and Screening

- Certified pharmacies must complete the *Sodium Oxybate REMS Program Patient Counseling Checklist* and submit to the Sodium Oxybate REMS Program for each patient prior to every shipment of sodium oxybate.
- Each time a pharmacist completes the *Sodium Oxybate REMS Program Patient Counseling Checklist*, the pharmacist must:
 - Verify that early refill requests have been thoroughly questioned and approved through the Sodium Oxybate REMS Program RMR procedure (see below).
 - Screen the patient for concomitant use of contraindicated medications (sedative hypnotics), alcohol, other CNS depressants, and other potentially interacting agents.
 - The pharmacist asks the patient if he or she is taking any other medications and can consult external pharmacy databases to identify drug interactions or prescriptions for other drug products that might have been filled at different pharmacies before filling the prescription.
 - If patient use of a contraindicated medication or other potentially interacting agent is confirmed, and if the prescriber has not indicated prior knowledge, then the pharmacist will notify and consult the prescriber about the risks of concomitant medication use prior to shipping sodium oxybate.
 - Screen the patient for other medical conditions.
 - The pharmacist asks the patient what other medical conditions he or she has.
 - If the patient indicates that he or she has a certain medical condition listed on the *Sodium Oxybate REMS Program Patient Counseling Checklist*, the pharmacist counsels the patient, and notifies the prescriber about the medical condition prior to shipping sodium oxybate.
 - Document the results of the patient screening, all reported concomitant medications and comorbid medical conditions, the action(s) taken, and the date the *Sodium Oxybate REMS Program Patient Counseling Checklist* is completed in the Sodium Oxybate REMS Program.
 - Submit the *Sodium Oxybate REMS Program Patient Counseling Checklist* to the Sodium Oxybate REMS Program online at www.SodiumOxybateREMSProgram.com or complete a print version and fax to the Sodium Oxybate REMS Program at 800-353-0987.
- Certified pharmacies must provide patients with 24/7 access to a pharmacist.

Clinical Usage Clarifications

The pharmacist must:

- Review the information on each *Sodium Oxybate REMS Program Prescription Form*.
- Notify and consult the prescriber if there are any clinical usage clarifications required, such as:
 - Dose over maximum recommended dose (9 g/night)
 - Non-standard doses or instructions
 - Possible errors in dosing or titration amounts or directions

If the issue is not resolved with the prescriber, the pharmacist may consult with the Pharmacist in Charge at their certified pharmacy and with the Sodium Oxybate REMS Program.

Prescription Refills

- Up to 5 refills are allowed on a sodium oxybate prescription (per DEA regulations for CIII controlled substances).
- Refills may be conveyed by phone or fax from the prescriber or patient and communicated to the Sodium Oxybate REMS Program by obtaining a PDA.
- For information on the prescription processing requirements see Module A – [Prescription Processing](#)
- Changes in dose require a new prescription.
- Refill orders should be opened at a patient's certified pharmacy when the patient has approximately 10 days of therapy remaining from the previous shipment.
 - A certified pharmacy technician will contact the patient and schedule a shipment. The technician will ask the patient if there has been any change in his or her medications or medical history.
 - The technician will transfer him or her to a pharmacist who must complete the *Sodium Oxybate REMS Program Patient Counseling Checklist*. The patient should be counseled on the use or diagnosis of:
 - Sedative hypnotics (for example, diazepam, phenobarbital, or zolpidem)
 - CNS depressants: including but not limited to opioid analgesics, benzodiazepines, sedating antidepressants or antipsychotics, sedating anti-epileptic drugs, general anesthetics, and muscle relaxants
 - Alcohol
 - Sleep apnea
 - Asthma, COPD, or other conditions affecting his or her breathing
 - Other current medical conditions
 - The pharmacist must complete refill counseling and confirmation of prescriber consultation or notification by completing and submitting the *Sodium Oxybate REMS Program Patient Counseling Checklist* to the Sodium Oxybate REMS Program online (www.SodiumOxybateREMSProgram.com) or by fax (800-353-0987).
- All patient requests for early refills are to be questioned and documented by the pharmacist.
 - An early refill request is a request for sodium oxybate shipment prior to the date of the next shipment.
 - Requests to accommodate shipment logistics (scheduled delivery date falls on a Sunday, holidays, and vacations) are not considered early refills.
 - If the early refill is required due to a dosage increase, a pharmacist must:
 - Confirm the new dosage with the prescriber prior to processing the prescription.
 - If an early refill is requested for any other reason, a pharmacist must:
 - Discuss the request with the patient to evaluate his/her compliance with therapy, assessing for misuse, abuse, and diversion.
 - Evaluate the patient's record in the Sodium Oxybate REMS Program using the certified pharmacy secure web viewing portal for the patient database and review the patient's prior Sodium Oxybate REMS Program RMR history to identify previous reports of early refills or other incidents suggestive of abuse, misuse, and diversion.
 - Contact the prescriber to discuss the request and any prior early refill requests or incidents suggestive of abuse, misuse, and diversion.
 - Send new shipments of sodium oxybate to the patient only if approved by the prescriber.
 - Send new shipments to replace sodium oxybate reported stolen by a patient only after obtaining a copy of the police report filed by the patient.
 - Document the discussion and outcome by completing and submitting the *Sodium Oxybate REMS Program RMR* to the Sodium Oxybate REMS Program online (www.SodiumOxybateREMSProgram.com) or by fax (800-353-0987).

Monitoring and Assessing for Signs of Abuse, Misuse, and Diversion

- Risk management events must be documented in the Sodium Oxybate REMS Program.
 - Risk management events are reported or discovered events outside the norm that give rise to a reasonable suspicion of abuse, misuse, or diversion
 - Examples of events that should generate a Sodium Oxybate REMS Program RMR include but are not limited to:
 - Requests for early refills
 - Patient's misuse or abuse of product
 - Lost, stolen, destroyed, or spilled drug
 - Delivery to incorrect address and not returned
 - Patient claims that product was not delivered while carrier shows receipt of delivery
 - Product tampering
 - Counterfeit product
 - Contaminated product
 - Inquiries and/or arrests by law or regulatory enforcement agencies associated with the misuse, abuse, or diversion of the product
 - Crimes related to the product
 - Sodium Oxybate REMS Program RMRs must document:
 - Patient and/or prescriber identifying information (patient names to be concealed)
 - Reason for report
 - Certified Pharmacy actions
 - Prescriber contact
 - Supporting documentation (if applicable, such as a police report, fire report, DEA Form 106, or shipper investigation report)
 - Pharmacies can request that a patient is monitored by the Sodium Oxybate REMS Program if serious or repeated events give rise to reasonable suspicion of misuse, abuse or diversion.
 - If abuse, misuse, or diversion is suspected, the pharmacist must review the patient's Sodium Oxybate REMS Program RMR history and discuss the incident with the prescriber prior to shipping sodium oxybate.
 - Repeated reports of lost, stolen, destroyed, or spilled drug will be documented as an alert to the patient record stored in the patient database of the Sodium Oxybate REMS Program and will be accessible to the dispensing pharmacist using the secure web viewing portal for the patient database for review prior to shipping drug.
 - Certified pharmacies and/or prescribers may direct the Sodium Oxybate REMS Program to disenroll a patient after review and discussion of incidents suggestive of abuse and misuse, or diversion by completing and submitting a *Sodium Oxybate REMS Program RMR Form* to the Sodium Oxybate REMS Program.. All requests from prescribers to disenroll a patient will be submitted to a certified pharmacy. The certified pharmacy is required to intake the request, then complete and submit the *Sodium Oxybate REMS Program RMR* to the Sodium Oxybate REMS Program to notify of disenrollment.
 - Pharmacies may recommend that a prescriber be disenrolled by submitting a Sodium Oxybate REMS Program RMR Form to the Sodium Oxybate REMS Program. Sodium Oxybate sponsors will review the information and determine if the prescriber should be disenrolled.
 - All *Sodium Oxybate REMS Program RMRs* must be reported to the Sodium Oxybate REMS Program online (www.SodiumOxybateREMSProgram.com) or by fax (800-353-0987).

Shipping Procedures

- Sodium oxybate must be shipped via an overnight service with receipt signature required.
 - Sodium oxybate is shipped directly to the patient or adult designee (18 years, or 21 years if required by carrier) if the patient is not available to receive the order.
- The patient may request an alternate shipping address, which is then subject to approval by a pharmacist.
- If the patient requests Saturday delivery, his or her certified pharmacy will verify with the overnight shipping service that it is available for the shipping address.
- Each sodium oxybate shipment must include:
 - The prescribed amount of medication, contained in one or more bottles of sodium oxybate
 - A press-in-bottle adaptor (PIBA) inserted into the bottle at the certified pharmacies
 - A sodium oxybate-specific grams-based oral measuring device (plastic syringe) to measure out each nightly dose
 - Two empty pharmacy vials with child-resistant caps for preparation of both nightly doses (sodium oxybate dose mixed with water)
 - A sodium oxybate Medication Guide
- Daily tracking reports must be generated by each certified pharmacy to confirm the receipt of each order shipped during the previous 48 hours. Saturday deliveries are confirmed the following Monday.
 - A patient will be contacted if there is no proof of patient or designee signature, if the patient or designee on file did not

sign for the shipment, or if there is a potential incomplete delivery.

- If a shipment is reported lost, an investigation will be launched to find it.
- Receipt of each shipment of sodium oxybate by a patient must be reported to the Sodium Oxybate REMS Program through the website (www.SodiumOxybateREMSProgram.com) or by calling (855-705-2424) by the patient's certified pharmacy.

Inventory Control

The sodium oxybate inventory must be reconciled at the start and end of each business day and recorded in the pharmacy management system. A physical count must match the count in the pharmacy management system). If the sodium oxybate inventory cannot be reconciled for any reason, no other patient orders can be processed until an investigation is completed by the Pharmacist in Charge and approved by the Sodium Oxybate REMS Program. Internal procedures for reconciling the sodium oxybate inventory are subject to audit.