

# Risk Evaluation and Mitigation Strategy (REMS) Document

## SUBLOCADE (buprenorphine extended-release) REMS Program

### I. Administrative Information

Application Number: NDA 209819  
Application Holder: Indivior Inc.  
Initial REMS Approval: [11/2017]  
Most Recent REMS Update: [12/2020]

### II. REMS Goal

The goal of the SUBLOCADE REMS is to mitigate the risk of serious harm or death that could result from intravenous self-administration by:

- Ensuring healthcare settings and pharmacies are certified and only dispense SUBLOCADE directly to a healthcare provider for administration by a healthcare provider

### III. REMS Requirements

**Indivior must ensure that healthcare settings, pharmacies, and wholesalers/distributors comply with the following requirements:**

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#### 1. Healthcare settings and pharmacies that dispense SUBLOCADE must:

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|---------------------------------|--|
| To become certified to dispense | <ol style="list-style-type: none"><li>1. Designate an authorized representative to carry out the certification process and oversee implementation and compliance with the REMS Program on behalf of the healthcare setting or pharmacy.</li><li>2. Have the authorized representative enroll in the REMS Program by completing the <a href="#">Healthcare Setting and Pharmacy Enrollment Form</a> and submitting it to the REMS Program.</li><li>3. Train all relevant staff involved in dispensing that the drug must be dispensed directly to a healthcare provider for administration by a healthcare provider, and the drug must not be dispensed to the patient.</li><li>4. Establish processes and procedures to verify SUBLOCADE is dispensed directly to a healthcare provider and the drug is not dispensed to the patient.</li><li>5. Establish processes and procedures to notify the healthcare provider not to dispense the drug directly to patients.</li></ol> |
| Before dispensing               | <ol style="list-style-type: none"><li>6. Verify that SUBLOCADE is dispensed directly to a healthcare provider and the drug is not dispensed to the patient.</li><li>7. Notify the healthcare provider not to dispense the drug directly to patients.</li></ol>   |
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To maintain certification to dispense	8. Have a new authorized representative enroll in the REMS Program by completing the <a href="#">Healthcare Setting and Pharmacy Enrollment Form</a> if the authorized representative changes.
At all times	9. Not distribute, transfer, loan or sell SUBLOCADE.  10. Maintain records of all processes and procedures including compliance with those processes and procedures.  11. Comply with audits by Indivior Inc. or a third party acting on behalf of Indivior to ensure that all processes and procedures are in place and are being followed for the SUBLOCADE REMS Program.

**2. Wholesalers/Distributors that distribute SUBLOCADE must:**

To be able to distribute	1. Establish processes and procedures to ensure that the drug is distributed only to certified healthcare settings and pharmacies.  2. Train all relevant staff involved in distributing SUBLOCADE on the process and procedures to verify the healthcare settings and pharmacies are certified.
At all times	3. Distribute only to certified healthcare settings and pharmacies.  4. Maintain and submit records of all shipments of SUBLOCADE to Indivior.  5. Comply with audits carried out by Indivior or a third party acting on behalf of Indivior to ensure that all processes and procedures are in place and are being followed.

**To inform healthcare providers about the REMS Program and the risks and safe use of SUBLOCADE, Indivior must disseminate REMS communication materials according to the table below:**

<b>Target Audience</b>	<b>Communication Materials-&amp; Dissemination Plans</b>
All prescribers certified to treat opioid dependence under the Drug Addiction Treatment Act of 2000 (DATA 2000); all pharmacies authorized by DEA to handle schedule III controlled substances on a national mailing list from the National Technical Information Service; all Opioid Treatment Programs certified under 42 CFR 8	REMS Letter: <a href="#">Healthcare Provider REMS Letter</a> with attachment: <a href="#">Fact Sheet: How to Obtain SUBLOCADE</a> 1. Mail within 60 calendar days of the date SUBLOCADE is first commercially distributed and again 6 months later, or 2. eMail within 60 calendar days of the date SUBLOCADE is first commercially distributed and again 6 months later. 3. Make available via a link from the SUBLOCADE REMS Program Website. 4. Disseminate through professional societies and request the content be provided to their members. 5. Disseminate at Professional Meetings for 1 year from the date SUBLOCADE is first commercially distributed.
All prescribers certified to treat opioid dependence under	REMS Letter: <a href="#">Healthcare Provider REMS Letter</a> with attachment: <a href="#">Fact Sheet: How to Obtain SUBLOCADE</a>

**Target Audience**

DATA 2000 since the last dissemination; all pharmacies authorized by DEA to handle schedule III controlled substances since the last dissemination; all Opioid Treatment Programs certified under 42 CFR 8 since the last dissemination

**Communication Materials-& Dissemination Plans**

6. Mail annually from the date SUBLOCADE is first commercially distributed, or
7. eMail annually from the date SUBLOCADE is first commercially distributed.

**To support REMS Program operations, Indivior must:**

1. Establish and maintain a REMS Program website, [www.SUBLOCADEREMS.com](http://www.SUBLOCADEREMS.com). The REMS Program website must include the capability to complete healthcare setting and pharmacy certification online, the option 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 Program website. The REMS Program website must not link back to the promotional product website.
2. Make the REMS Program website fully operational and all REMS materials available through website and call center by the date SUBLOCADE is first commercially distributed.
3. Establish and maintain a REMS Program call center for REMS participants at 1-866-258-3905.
4. Establish and maintain a validated, secure database of all REMS participants who are enrolled and/or certified in the SUBLOCADE REMS Program.
5. Ensure healthcare settings and pharmacies are able to enroll by fax, mail, email, and online.
6. Provide [Healthcare Provider REMS Letter](#), [Fact Sheet: How to Obtain SUBLOCADE](#), [Healthcare Setting and Pharmacy Enrollment Form](#) and the Prescribing Information to REMS participants who (1) attempt to dispense SUBLOCADE and are not yet certified or (2) inquire about how to become certified.
7. Notify healthcare settings and pharmacies, confirming certification, within 7 calendar days after they become certified in the REMS Program.
8. Provide wholesalers/distributors access to the database of certified healthcare settings and pharmacies.

**To ensure REMS participants' compliance with the REMS Program, Indivior must:**

9. Verify annually that the authorized representative's name and contact information correspond to those of the current designated authorized representative for the certified healthcare setting or pharmacy. If different, the healthcare setting and pharmacy must be required to re-certify with a new authorized representative.
10. Maintain adequate records to demonstrate that REMS requirements have been met, including, but not limited to records of: SUBLOCADE distribution and dispensing; certification of pharmacies and healthcare settings; and audits of REMS participants.
11. Establish a plan for addressing non-compliance with REMS Program requirements.
12. Monitor healthcare settings, pharmacies, and wholesalers/distributors on an ongoing basis to ensure the requirements of the REMS are being met. Take corrective action if non-compliance is identified, including de-certification.

13. Audit 10% of healthcare settings no later than 90 calendar days after they become certified, and 10% annually thereafter, to ensure that all REMS processes and procedures are in place, functioning, and support the REMS Program requirements. Annual audits must include healthcare settings that have received at least one shipment of SUBLOCADE in the past 12 months and not have been audited in the past 3 years.
14. Audit pharmacies no later than 90 calendar days after the pharmacy receives its first shipment, and 10% annually thereafter, to ensure that all REMS processes and procedures are in place, functioning, and support the REMS Program requirements. Annual audits must include pharmacies that have received at least one shipment of SUBLOCADE in the past 12 months and not have been audited in the past 3 years.
15. Audit wholesalers/distributors no later than 90 calendar days after they become authorized or from the date SUBLOCADE is first commercially distributed (whichever is later), and annually thereafter, to ensure that all REMS processes and procedures are in place, functioning, and support the REMS Program requirements.
16. Take reasonable steps to improve implementation of and compliance with the requirements in the SUBLOCADE REMS Program based on monitoring and evaluation of the SUBLOCADE REMS Program.

#### **IV. REMS Assessment Timetable**

Indivior must submit REMS Assessments at 6 months, 12 months, and annually thereafter from the date of the initial approval of the REMS (11/30/2017). 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. Indivior 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 SUBLOCADE REMS and are appended:

##### **Enrollment Forms:**

Healthcare Setting and Pharmacy:

1. [Healthcare Setting and Pharmacy Enrollment Form](#)

##### **Communication Materials**

2. [Healthcare Provider REMS Letter](#)
3. [Fact Sheet: How to Obtain SUBLOCADE](#)

##### **Other Materials**

4. [REMS Program Website](#)